

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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**CRISIS PREGNANCY SERVICES, INC.,  
d/b/a COMPASSCARE**

Case No: 23-1057

Plaintiff,

v.

**HANNAH KAMKE and JENNIFER L.  
PAGE, JOHN DOE 1 and JANE DOE 2**

Defendant(s).

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**FIRST AMENDED  
COMPLAINT AND  
DEMAND FOR A JURY  
TRIAL**

Plaintiff, Crisis Pregnancy Services, Inc., d/b/a CompassCare (hereinafter CompassCare), by and through its counsel, Ganguly Brothers, PLLC, and Christopher A. Ferrara (Senior Counsel – Thomas More Society) for its First Amended Complaint against Defendants, Hannah Kamke, Jennifer L. Page, John Doe 1, and Jane Doe 2, states as follows, upon knowledge as to its own acts and otherwise upon information and belief:

**PRELIMINARY STATEMENT**

1. The actions of the Defendants herein arise in, and are intended to exploit, a climate of fear in the context of violence against pro-life pregnancy centers and health care facilities by militant pro-abortion advocates over the past several years. The problem has significantly increased since the leak of the US Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization* which overturned a federal so-called right to abortion.

2. On May 2, 2022, Politico published a leaked draft of the *Dobbs* opinion, which showed the Supreme Court's intent to overturn *Roe v. Wade*.

3. On November 15, 2022, FBI Director Christopher Wray gave a troubling statistic while speaking at a hearing before the Senate Homeland Security Committee that approximately 70% of abortion-related threats of violence in the US since the *Dobbs* leak have been against pro-life groups.

4. More than 310 crisis pregnancy centers (CPCs), pro-life organizations and churches have been attacked, some repeatedly, since the *Dobbs* leak. More than a dozen attacks have been claimed by the left-wing, pro-abortion, extremist group known as “Jane’s Revenge”; however, upon information and belief, few if any members of the group have been arrested.

5. In response to *Dobbs*, “Jane’s Revenge” carried out multiple attacks on pro-life organizations, churches, and a Congressional office. The attacks included firebombing, vandalism, and arson. By the end of 2022, “Jane’s Revenge” had claimed responsibility for at least sixteen (16) such attacks.

6. “Jane’s Revenge” often leaves their “calling card”: the phrase “Jane Was Here” graffitied at the site of the attack.

7. “Jane’s Revenge” has vowed a nationwide campaign of unending violence in retaliation for the *Dobbs* decision under the motto “If Abortions Aren’t Safe, Neither Are You.”<sup>1</sup> After the fire-bombing of a pro-life crisis pregnancy center in Wisconsin, “Jane’s Revenge” issued its “First Communiqué,” stating as follows: “Again, this was only a warning. Next time the infrastructure of the enslavers will not survive. Medical imperialism will not face a passive enemy. Wisconsin is the first flashpoint, but we are all over the US, and we will issue no further

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<sup>1</sup> See Jessie J. Norris, “‘If Abortions Aren’t Safe, Neither Are You:’ A Mixed-Method Study of Jane’s Revenge and Other Post-Dobbs Militancy,” 33 *Journal for Deradicalization*, Winter 2022/23 at 108; <https://journals.sfu.ca/jd/index.php/jd/article/view/671/389> (last accessed January 4, 2024).

warnings.... We are not one group, but many. We are in your city. We are in every city....”<sup>2</sup>

8. In keeping with this threat, pro-life pregnancy centers across the nation in particular have been subjected to arson and other attacks. (See annexed **EXHIBIT A**). As “Jane’s Revenge” declared on June 15, 2022:

You have seen that we are real, and that we are not merely pushing empty words. As we said: we are not one group but many. You have seen us in Madison WI, Ft. Collins CO, Reisertown MA [*sic*], Olympia WA, Des Moines IA, Lynwood WA, Washington DC, Ashville NC, Buffalo NY, Hollywood FL, Vancouver WA, Frederick MA, Denton TX, Gresham OR, Eugene OR, Portland OR, among others, and we work in countless locations invisibly. **You’ve read the communiqués from the various cells, you’ve seen the proliferating messages in graffiti and elsewhere, and you know that we are serious.** (See annexed **EXHIBIT B**)

9. CompassCare was one of the pro-life organizations attacked by “Jane’s Revenge”. On June 7, 2022, two masked individuals (herein referred to as “the Doe Defendants”), whose identities are yet to be confirmed, firebombed CompassCare’s Amherst, New York, facility by throwing Molotov cocktails through a window.



Figure 1. Photo of damage to CompassCare’s Amherst, NY, facility caused by the June 7, 2022, firebombing.

<sup>2</sup> See: [Jane’s Revenge First Communiqué](https://theanarchistlibrary.org/library/janes-revenge-first-communicue) <https://theanarchistlibrary.org/library/janes-revenge-first-communicue>

10. The firebombing drew a large response from firefighters and law enforcement. At least two firefighters were injured in the blaze. Damage to the facility exceeded five hundred thousand dollars (\$500,000) and forced the closure of the facility and the diversion of clients to other CompassCare locations for 52 days while repairs were undertaken.

11. In addition to the firebombing, the Doe Defendants are responsible for spray- painting graffiti on the building saying “Jane was Here”.



Figure 2. Photo of Jane’s Revenge’s “calling card: the phrase “Jane Was Here” spraypainted on CompassCare’s Amherst, NY, facility.

12. Originally intended to be used to protect abortion clinics, Freedom of Access to Clinic Entrances Act, 18 U.S.C. §248, (“FACE”) makes it a federal crime to use force, the threat of force, or physical obstruction to interfere with, injure, or intimidate clinic workers or women seeking abortions or other reproductive health services.

13. Purporting to be viewpoint-neutral, FACE is supposed to provide the same protection to pro-life pregnancy centers like CompassCare, whose mission is to provide alternatives to abortion. While for many years FACE was used by attorneys general and abortion service

providers to prosecute pro-life advocates exclusively, FACE equally applies to protect pro-life pregnancy clinics and centers against violent pro-abortion advocates.

14. FACE also grants the right to a private cause of action against violators, so that victims can seek civil remedies against individuals who violate FACE. Despite the numerous attacks against pro-life groups, there have been appallingly few prosecutions of the attackers, as opposed to numerous aggressive federal prosecutions of non-violent pro-life demonstrators at abortion clinics.

15. CompassCare is leading the growing list of pro-life victims of FACE violations who are calling for action from law enforcement. CompassCare's demand is simple: equal protection under the law.

16. Through this lawsuit, CompassCare is seeking justice for the illegal actions taken by the defendants against CompassCare's employees, clients, and property.

### **NATURE OF THE ACTION**

17. As more particularly alleged below, this lawsuit is brought against Defendants Hannah Kamke and Jennifer L. Page, as well as the Doe Defendants, on the grounds that they violated FACE by means of force, threats, intimidation and/or physical obstruction by which they intended to interfere with or prevent, or attempt to interfere with or prevent, women from obtaining pro-life reproductive healthcare services provided by CompassCare, and to interfere with or prevent, or attempt to interfere with or prevent, the providing or obtaining of those pro-life pregnancy-related services by CompassCare staff and volunteers.

18. Defendants so acted because CompassCare provided such services, which Defendants militantly oppose in the aforesaid context of the nationwide wave of violence against pro-life

pregnancy centers in retaliation for the *Dobbs* decision, including the firebombing of CompassCare's Amherst, NY, facility.

19. Plaintiff seeks an award of compensatory and punitive damages against the Defendants, injunctive relief, and attorney fees and costs.

### **JURISDICTION AND VENUE**

20. The Court has jurisdiction over this action pursuant to 28 U.S.C. §1331 as a federal question is at issue under the laws of the United States.

21. This private action under FACE authorized by 18 U.S.C. §248(c)(1)(A).

22. Venue lies in this district pursuant to 28 U.S.C. §1391(b)(1) and 28 U.S.C. §1391(b)(2) because the defendants reside in the judicial district and a substantial part of the events giving rise to the claim occurred in Erie County, Town of Amherst, NY, which is in the Buffalo division of the Western District of New York.

23. This Court is authorized to grant permanent injunctive relief pursuant to Rule 65 of the Federal Rules of Civil Procedure and 18 U.S.C. §248(c)(1)(B).

24. This Court is authorized to grant compensatory and punitive damages and costs, including reasonable attorney fees, under 18 U.S.C. §248(c)(1)(B).

### **LEGAL STANDARD**

25. FACE subjects to civil penalties any person who “by force or threat of force . . . intentionally . . . intimidates or interferes with or attempts to . . . intimidate or interfere with any person because that person is or has been . . . providing reproductive health services.” 18 U.S.C. §248(a)(1).

26. FACE also subjects to civil penalties any person who “intentionally damages or destroys the property of a facility, or attempts to do so, because such facility provides reproductive health services.” *Id.* §248(a)(3).

27. FACE authorizes a private right of civil action by any person aggrieved by reason of the conduct prohibited [enumerated in subsection (a)] *Id.* §248(c)(1)(A).

28. FACE defines “reproductive health services” as “reproductive health services provided in a . . . clinic or other facility, and includes medical, surgical, counseling or referral services relating to the human reproductive system, including services related to pregnancy.” *Id.* §248(e)(5).

29. FACE defines “facility” as “a hospital, clinic, physician’s office, or other facility that provides reproductive health services, and includes the building or structure in which the facility is located.” *Id.* §248(e)(1).

30. FACE provides that “the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief and compensatory and punitive damages, as well as the costs of suit and reasonable fees for attorneys. With respect to compensatory damages, the plaintiff may elect, at any time prior to the rendering of final judgment, to recover, in lieu of actual damages, an award of statutory damages in the amount of \$5,000 per violation.” *Id.* §248(c)(1)(B).

### **FACTUAL ALLEGATIONS**

31. Plaintiff, CompassCare, is a New York not-for-profit corporation with a principal place of business in Rochester, New York, which operates a reproductive health facility in Amherst, New York (“Amherst Facility”). Plaintiff’s Amherst Facility provides health care services to women with unplanned pregnancy and sexual health needs. For over 40 years



CompassCare has been Upstate New York's leader in providing women with pro-life reproductive health services. All services are provided at no cost.

32. Defendant Jennifer L. Page, a/k/a Jennifer L. Clark and "Queen City Feminist" [REDACTED] is a self-described "abortion enthusiast" and "Antifa Wannabe" who resides in Buffalo, NY.

33. Page has obsessively devoted herself to radical pro-abortion activism against pro-life pregnancy centers in general and CompassCare in particular. In connection with her extremist activity, Page relies on a select few ANTIFA/Socialist media platforms to document and post attacks on pregnancy centers, which proliferated since the leaking, in May 2022, of the Supreme Court's June 2022 decision in *Dobbs v. Jackson Women's Health Organization*, overturning *Roe v. Wade*. One group in particular called "Radical Graffiti" is directly affiliated with Page historically. Every time "Radical Graffiti" covered an attack on a crisis pregnancy center, Page reposted it, "Liked" the post, or commented approvingly.

34. Before the June 7, 2022, bombing at CompassCare's Amherst, NY, facility, Page, along with three Antifa chapters, favorably acknowledged and posted "Likes" of reports of a "Jane's Revenge" attack on a crisis pregnancy center in Maryland. Page has been following "Jane's Revenge" on social media from its first digital appearances.

35. Page has twice made reference to arson against crisis pregnancy centers on social media, including a reference to "two Molotov cocktails" as a Christmas gift in a parody of the song "The Twelve Days of Christmas." On the second occasion, following the leaking of the *Dobbs* decision, and thus only days before the bombing at Amherst, she stated: "Get the matches because I am the f---ing gasoline."



36. Defendant Hannah Kamke, a/k/a Hannah Kam, a resident of Buffalo, NY, is a pro-abortion extremist and activist who, on information and belief, posed as a potential client of CompassCare in a politically-motivated effort to “expose” non-existent fraud and deception in CompassCare’s pro bono services to expectant mothers—services Kamke knew at all pertinent times do not include abortion or referral for abortion, as pleaded more particularly below.

37. On or about May 1, 2021, defendant Page, using the name “Queen City Feminist” on social media, organized a demonstration against CompassCare’s “Walk for Life”. The “Walk for Life” is an annual family-friendly event hosted by CompassCare to raise awareness of the value of all human life, while raising funds to provide for the unmet healthcare resource needs of women considering abortion.

38. Page organized a counter protest at said “Walk for Life”, wherein pro-abortion extremists banded together in disguise to block the public highway in order to prevent pro-life citizens from exercising their First Amendment rights, and to threaten and intimidate patients, employees, prospective patients and supporters of CompassCare from working at, seeking services from, or supporting CompassCare.

39. Upon information and belief, some of the specific acts during the protest Page organized included illegally blocking a public highway and engaging in acts of assault on “Walk for Life” participants and police, including the placing of vertical spikes in the road in order to injure pro-life marchers. Page’s co-conspirators hit a police officer with a bullhorn, punched a CompassCare supporter, placed nails and glass in a public walkway (injuring at least one person), and graffitied lewd, vulgar, threatening messages on the sidewalk. These actions were intended by Page to induce fear of violence, including bodily harm in the context of the already ongoing

nationwide campaign of violence by “Jane’s Revenge”, which would soon claim CompassCare and its clients and staff among its victims.

40. On two subsequent occasions, Page organized demonstrations at the Amherst Facility, trespassing on the property and writing graffiti in the driveway of the facility, thereby blocking the entrance to the facility’s parking lot and intending to deter, and in fact deterring, staff, volunteers, and patients from entering the facility. The graffiti included the statement “Lying to women is a sin,” written on the private portion of CompassCare’s driveway next to the very windows through which, days later, Molotov cocktails were thrown by “Jane’s Revenge” activists during the June 7, 2022, bombing. Page celebrated the bombing on social media, while claiming “it wasn’t me” and that she had an alibi.

41. On yet another occasion, Page trespassed at the Amherst Facility and stole a no-trespassing sign. She was eventually arrested and charged by Amherst Police with theft.

42. Page’s actions on both occasions were brazen intimidation in violation of FACE intended to send the message “You are not safe” from her or from “Jane’s Revenge” and other radical pro-abortion extremists.

43. Upon information and belief, following her arrest and/or during her interrogation for theft of CompassCare’s sign, Page, reportedly in exchange for leniency, provided law enforcement with information regarding two potential suspects in connection with the June 7, 2022, firebombing, which by then had taken place. On information and belief, one of those suspects retained counsel and refused to speak to law enforcement, while the other could not be reached.

44. Thus, Page was likely in contact with these suspects, which increased the intimidatory impact of her actions as alleged above, inducing Plaintiff’s reasonable fear that Page herself was a participant in either the bombing by the Doe Defendants or in other acts of violence by

“Jane’s Revenge”—all of which Page had enthusiastically supported, including the Amherst bombing. In fact, immediately after the firebombing of the Amherst facility, Page arrived at the scene to videotape the damage for use in her celebration of the bombing in Instagram postings.

45. On or about March 16, 2023, at or around 12:30 AM, Defendant Kamke also trespassed at the Amherst facility property, which had resumed operations after the bombing and the completed repairs which the bombing had made necessary, and spray-painted graffiti over the property’s large business signage reading “Liars”. That threatening message tellingly echoed Page’s earlier threatening message, days before the Amherst bombing, that “Lying to women is a sin.” The cost of the damage to the sign was over two thousand five hundred dollars (\$2,500). Kamke was arrested, charged, and subsequently pled guilty to disorderly conduct in Amherst Town Court in connection with this incident. For engaging in the same conduct of spray-painting “Liars” on the building of a pro-life crisis pregnancy center, along with “Jane’s Revenge”, an Ohio woman was charged and convicted for violating FACE by the Department of Justice only weeks ago.<sup>3</sup> That incident evidences a nationwide “playbook” for threatening pro-life pregnancy centers with violence, making defendants’ conduct here all the more intimidating.

46. Kamke engaged in this conduct with the intention of intimidating CompassCare staff and clients and physically interfering with and damaging the clinic’s operations by means of a visible “warning shot” — the declaration “Liars” — in the context of Page’s warning “Lying to women is a sin” days before Amherst bombing by the Doe Defendants, and the subsequent spray-painted warning “Jane was here.” The threatening implication of Kamke’s conduct, like Page’s

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<sup>3</sup> See DOJ press release at <https://www.justice.gov/opa/pr/ohio-woman-pleads-guilty-freedom-access-clinic-entrances-face-act-violation-damaging>

conduct, was clear: “Jane” could return to inflict more damage on the facility, which had already been repaired at great cost.

47. On information and belief, at the time of Kamke’s threatening and destructive conduct, Page and Kamke were following each other on Instagram: Page as “Queen City Feminist” and Kamke as “stormy.hannah” (aka “Hannah Kam”). Page and Kamke have significant Instagram followings, indicating not only that they are connected to each other, but also with many others regarding pro-abortion extremist activity—it further appearing that Page, as noted above, has some connection to the Doe Defendants, because of which she was able to supply information about two firebombing suspects to the Amherst police.

48. Based on the foregoing facts, Plaintiff reasonably believes that both Page and Kamke belong to a “cell” of local pro-abortion extremists who consider it their mission to intimidate, interfere with, and obstruct the operation of pro-life pregnancy centers, and CompassCare in particular, which is in their vicinity, in keeping with the view of the radical fringe of the pro-abortion movement that crisis pregnancy centers are “fake clinics”—meaning “fake” from their pro-abortion extremist perspective simply because they do not provide abortions but rather support women free-of-charge in crisis pregnancies so they can choose life rather than abortion. (*See EXHIBITS A and B*, supra).

49. Further, in response to this suit, Kamke has filed a sprawling, 38-page “shotgun” counterclaim (ECF No. 14 at 16-54) whose patently implausible claims, laced with political cant, support the conclusion that Kamke is a radical pro-abortion extremist who despises the work of pro-life pregnancy centers and, because of that motivation, posed as a potential client of CompassCare in a vain attempt to contrive a sham “consumer fraud” claim, which she never

pursued in any way until this action was brought against her. That Kamke engaged in this deception is indicated by the following facts:

(a) The first 20 paragraphs of Kamke’s Counterclaim are essentially a screed reciting the usual pro-abortion talking points against pro-life crisis pregnancy centers as applied to CompassCare, indicating Kamke’s militant political opposition to CompassCare’s pro-life mission despite its perfectly lawful pro bono services to women facing a crisis pregnancy.

(b) Kamke alleges (¶¶ 28-29) that, suspecting she was pregnant and that she would immediately obtain an abortion if this was confirmed, she conducted a Google search for “abortion services in Buffalo” and that CompassCare was “one of the top results...” That claim is demonstrably false. In fact, first-time searches for “abortion services in Buffalo” – not weighted by earlier browser history on a given pregnancy services provider – show that *all* of the top 9 or 10 results are clearly identified abortion clinics, but not CompassCare. (See annexed **EXHIBIT C**) CompassCare could not possibly have been a top organic search result over well-established “brand name” abortion providers, such as Planned Parenthood, unless a previous search history specifically on CompassCare cached in Kamke’s browser—in preparation for her activities against the Plaintiff—had already algorithmically prioritized CompassCare in her personal search results. It defies belief that Kamke would have contacted only the ninth or tenth result, listing what she alleges was an unknown provider, while ignoring all the higher-ranking results of known abortion providers.

(c) Furthermore, even a cursory examination of CompassCare’s website reveals “Abortion” is notably absent from the list of services provided. Its pro-life orientation is also clear from its warnings about “Abortion Risks and Side Effects”, risks associated with the “Abortion Pill”, and listing “Abortion Pill Reversal” as one of the services they do provide.

(d) Kamke’s sham, politically-motivated claim of “deceptive advertising” is further belied by the fact that a Google search for “CompassCare” itself—which a bona fide potential client would conduct for actual client reviews and other provider information regarding something as urgent as Kamke’s supposed need for an immediate abortion—returns the following: “CompassCare® - *Erasing the Need for Abortion.*” (emphasis added) (See annexed **EXHIBIT D**)

(e) In view of the Google search-related facts set forth above, it is inconceivable that Kamke’s *first and only* choice for abortion services would have been CompassCare rather than one of the well-known abortion providers. (See annexed **EXHIBIT E**).

(f) Despite the above-noted facts, Kamke incredibly alleges that when she sought an appointment at CompassCare for free pregnancy testing and an ultrasound, she

blithely assumed CompassCare provided abortions. Yet in the same counterclaim (§ 31), she alleges that during the initial phone conversation with a CompassCare staffer she “directly asked the employee if CompassCare provided abortions” and that the employee “did not clearly answer” the question—a question Kamke would not have asked if, as she implausibly alleges, she had already been misled into believing that CompassCare provided abortions. Further, if the answer given was not clear, it is not credible that Kamke would proceed with an appointment to obtain the immediate abortion she claims she wanted urgently to obtain if she were really pregnant.

(g) Continuing her patently incredible tale, Kamke claims she was “defrauded” even though she admits that during her appointment at CompassCare on December 1, 2021, she was informed in a written release she signed in the waiting room that CompassCare *does not provide or refer for abortions*. (§§ 31-32; Exhibit L to Counterclaim at 10).

(h) Even after being informed that CompassCare does not perform or refer for abortions, Kamke claims she “did not leave because she needed a free pregnancy test and ultrasound.” (§§ 35-36). That is, she frivolously alleges fraud by the same pro-life organization whose free services *she willingly continued to seek*, even to the extent of *signing another release form* in order to obtain them. (§§ 32-33).

(i) Knowing full well that abortion was not available at CompassCare and that CompassCare was a pro-life organization *opposed* to abortion, Kamke incredibly alleges that she *still* wanted services from CompassCare even though she allegedly *first* had to endure what she falsely characterizes as twenty minutes of pro-life “proselytization”, the offering of pro-life literature, and “intrusive questions” by CompassCare employee Chapman—a registered nurse. (§§ 36-37).

(j) Kamke admits CompassCare administered a free laboratory pregnancy test that Nurse Chapman informed her was negative. Yet, Kamke claims that another CompassCare employee told her “there had been a ‘miracle’ that had turned Kamke’s negative pregnancy test positive.” (§ 39). Nevertheless, Kamke admits that CompassCare’s own records, produced at her criminal trial, “unequivocally demonstrate that Kamke’s pregnancy test was negative.” (§ 42 and Exhibit L to Counterclaim at 6-9). Kamke further alleges that she obtained a free ultrasound from CompassCare that also showed no pregnancy. (§§ 38-39).

(k) Yet Kamke claims that because of CompassCare she was “confused about if she was pregnant or not” and that she “lived with this agonizing unclarity for weeks”—despite an “unequivocally negative” pregnancy test and an alleged negative ultrasound. (§ 40) That claim is belied by the return of the menstrual cycle that must have occurred during those weeks—which she reported to CompassCare in a report she now denies ever making. (§42)

(l) Based on her alleged “agonizing” “confusion” about whether she was pregnant, and her allegedly being subjected to “religious proselytization” during her visit at CompassCare, Kamke outlandishly claims her entire life has been ruined by CompassCare, including a descent into alcohol abuse, and that she “remains traumatized.” Kamke even blames CompassCare for being fired from her job after she pleaded guilty to the criminal offense she committed against CompassCare. Kamke now frivolously asserts that CompassCare is somehow responsible for her lost income when her firing would more accurately be attributed to her own guilt and criminal conviction, or to her failure to fulfill the job requirements. (¶¶ 41, 45)

(m) While now claiming to be a victim of “fraud” and “medical malpractice” that ruined her life, Kamke sought no remedy against CompassCare and did not even file a consumer complaint during the nearly two years that elapsed before CompassCare sued her. Only then did Kamke lodge a “shotgun” counterclaim that is largely a lawyer-written pro-abortion diatribe against pro-life pregnancy centers.

50. The facts recited in ¶¶ 45-49 (a)-(m) of this First Amended Complaint are pleaded to show that, like Page, Kamke’s motives in violating FACE were those of a pro-abortion extremist intent on interfering with the operation of CompassCare because CompassCare provides the kind of reproductive health services with which she politically disagrees—contrary to the averment in her Counterclaim that she “did *not* act out of a broader political motive or to make a statement about abortion writ large.” (¶ 43)(emphasis in original).

### **FIRST CAUSE OF ACTION**

#### **Threatening and Intimidating Persons in Violation of 18 U.S.C. §248(a)(1)**

51. Plaintiff hereby repeats and realleges the allegations of ¶¶ 1-50 as if set forth in full below.

52. The FACE Act prohibits threatening or intimidating, or attempting to threaten or intimidate “any person because that person is or has been . . . providing reproductive health services.” 18 U.S.C. §248(a)(1).

53. “Intimidate” means “to place a person in reasonable apprehension of bodily harm to him- or herself or to another.” 18 U.S.C. § 248(e)(3).



54. “Reproductive health services” includes “medical” and “counseling” services related to pregnancy. *Id.* §248(e)(5).

55. The persons who worked at the CompassCare facility in Amherst, NY, at the time it was forced to close following the firebombing, were providing reproductive health services.

56. By their deliberate acts of trespass, damage, theft and vandalism as aforesaid, including the use of graffitied or spray-painted statements defacing Plaintiff’s property as a “warning” that CompassCare remained subject to further violence at any time—evoking the spray-painted warning “Jane was here”—Defendants Page and Kamke intentionally threatened and intimidated, or attempted to threaten and intimidate, clients, potential clients, and staffers at the CompassCare facility in Amherst, NY, because those clients, potential clients, and staffers sought or had obtained, provided or would provide, pro-life reproductive health services.

57. The Doe Defendants likewise violated FACE by firebombing CompassCare’s Amherst facility.

58. Based on their radical pro-abortion extremist views, and their enmity toward pro-life crisis pregnancy centers, Defendants Page and Kamke, and the Doe Defendants, willfully and maliciously committed these violations as part of a wave of violence against pro-life pregnancy centers, to which Page and Kamke knowingly contributed by trespass and graffitied “warnings” on CompassCare’s property that they knew would give rise to a reasonable fear of bodily harm in clients, potential clients, and staffers alike by sending the message that any pro-abortion extremist, at any time, including these Defendants, could walk onto CompassCare’s property to commit further acts of violence and destruction.

59. Plaintiff is thus entitled to an award of compensatory and punitive damages or, in the alternative, statutory damages under FACE against all the Defendants, jointly and severally, as well as the costs of suit and reasonable fees for attorneys.

## **SECOND CAUSE OF ACTION**

### **Engaging in Physical Obstruction in Violation of 18 U.S.C. §248(a)(1)**

60. Plaintiff hereby repeats and realleges all allegations in ¶¶ 1-50 as if made in full below.

61. FACE prohibits the use of physical obstruction to “intentionally injure[], intimidate[] or interfere[]with” or to “attempt[] to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons from, obtaining or providing reproductive health services.”

62. Defendant Page violated FACE by intentionally engaging in physical obstruction as aforesaid when she trespassed on the property and wrote graffiti on the driveway of CompassCare’s Amherst facility, while blocking the entrance to the facility’s parking lot and intending to physically obstruct or attempting to physically obstruct, and in fact obstructing, staff, volunteers, and patients from entering the facility.

63. The Doe Defendants violated FACE by firebombing CompassCare’s Amherst facility, thereby physically obstructing its operations.

64. Page and the Doe Defendants so acted intentionally to intimidate, or attempt to intimidate, CompassCare staffers, clients or potential clients from obtaining or providing reproductive health services because said persons were obtaining or providing reproductive health services.

65. Based on their radical pro-abortion extremist views, and their enmity toward pro-life crisis pregnancy centers, especially CompassCare, Page and the Doe Defendants willfully and maliciously committed these violations as part of a wave of violence against pro-life pregnancy

centers, including the prior firebombing itself, to which context of violence Page knowingly contributed and exploited in the knowledge that her trespass and physical obstruction would give rise to a reasonable fear of bodily harm in clients, potential clients, and staffers. To recall Page's social media threat: "Get the matches, I am the f---ing gasoline."

66. Plaintiff is thus entitled to an award of compensatory and punitive damages or, in the alternative, statutory damages under FACE against Defendant Page and the Doe Defendants, jointly and severally, as well as the costs of suit and reasonable fees for attorneys.

### **THIRD CAUSE OF ACTION**

#### **Engaging in force in violation of 18 U.S.C. §248(a)(1)**

67. Plaintiff hereby repeats and realleges all allegations in ¶¶ 1-50 as if made in full below.

68. FACE prohibits the use of force to "intentionally injure[], intimidate[] or interfere[]with" or to "attempt[] to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons from, obtaining or providing reproductive health services."

69. The Doe Defendants used force in firebombing CompassCare's Amherst, NY, facility intentionally to injure and intimidate, or attempt to injure and intimidate, CompassCare staffers, clients or potential clients so as to prevent them, or attempt to prevent them, from obtaining or providing reproductive health services. The Doe Defendants so acted because said persons were obtaining or providing reproductive health services.

70. Based on their obvious radical pro-abortion extremist views, and their enmity toward pro-life crisis pregnancy centers, the Doe Defendants willfully and maliciously committed these violations as part of a wave of violence against pro-life pregnancy centers.

71. Plaintiff is thus entitled to an award of compensatory and punitive damages or, in the alternative, statutory damages under FACE against the Doe Defendants, jointly and severally, as well as the costs of suit and reasonable attorney fees.

**FOURTH CAUSE OF ACTION**

**Damaging the Property of a Reproductive Health Services Facility  
in Violation of 18 U.S.C. §248(a)(3)**

72. Plaintiff hereby repeats and realleges all allegations in ¶¶ 1-50 as if made in full below.

73. FACE prohibits “intentionally damag[ing] or destroy[ing] the property of a facility, or attempting to do so, because the facility provides reproductive health services.” 18 U.S.C. §248(a)(3).

74. “Reproductive health services” includes “medical” and “counseling” services related to pregnancy. *Id.* §248(e)(5).

75. The CompassCare facility in Amherst, NY, provides reproductive health services.

76. All the Defendants, in the differing ways pleaded above, intentionally vandalized and damaged the property of the CompassCare facility in Amherst, NY, or attempted to do so, because it provides reproductive health services.

77. Based on their radical pro-abortion extremist views, and their enmity toward pro-life crisis pregnancy centers, all the Defendants willfully and maliciously committed these violations during a wave of violence against pro-life pregnancy centers, knowing that their actions would exploit, and contribute to, fear over that wave of violence.

78. Plaintiff is thus entitled to an award of compensatory and punitive damages or, in the alternative, statutory damages under FACE against Defendants Page and Kamke, and the Doe Defendants, jointly and severally, as well as the costs of suit and reasonable attorney fees.

**FIFTH CAUSE OF ACTION**

**Request for Permanent Injunctive Relief – 18 U.S.C. §248(c)(1)(B)**

79. Plaintiff hereby repeats and realleges all allegations in ¶¶ 1-78 as if made in full below.

80. FACE authorizes Plaintiff to seek permanent injunctive relief. 18 U.S.C. §248(c)(1)(B).

81. All the Defendants have a history of violent and/or disruptive criminal behavior towards CompassCare, whose existence they regard as an evil to be eliminated. That conduct either violated or attempted to violate the provisions of FACE cited above.

82. Accordingly, a targeted injunction against all Defendants is appropriate “because of [their] past actions in the context of a specific dispute between real parties.” *McCullen v. Coakley*, 573 U.S. 464, 492 (2014) (internal citation and quotation omitted).

83. Given their manifest extremism in the existing context of violence against pro-life crisis pregnancy centers, including the firebombing of CompassCare’s Amherst, NY, facility by “Jane’s Revenge” via the Doe Defendants (regarding whom Defendant Page has knowledge and whose acts she has applauded); and given the links between Page and Kamke in that same context of violence, CompassCare reasonably fears that any or all of the Defendants will continue to unlawfully intimidate and interfere with CompassCare’s provision of its pro-life reproductive health services in the State of New York.

84. In absence of injunctive relief prohibiting further FACE violations by Defendants Page, Kamke and the Doe Defendants, Plaintiff CompassCare will suffer irreparable harm.

85. Accordingly, Plaintiff is entitled to permanent injunctive relief prohibiting the Defendants from injuring, intimidating or interfering with, or attempting to intimidate, injure or interfere with, CompassCare staffers, clients or potential clients by means of force, threats of force, vandalism, or physical obstruction, as well as prohibiting further damage to CompassCare’s

property, with or without an intent to injure, intimidate or interfere, because CompassCare provides reproductive health services.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands the following relief:

(A) As to the First Cause of Action - Threatening and Intimidating Persons in Violation of 18 U.S.C. §248(a)(1): an award of compensatory and punitive damages or, alternatively, statutory damages in favor of Plaintiff CompassCare and against Defendants Page, Kamke and the Doe Defendants, jointly and severally, as provided in FACE, as well as costs and reasonable attorney fees.

(B) As to the Second Cause of Action - Engaging in Physical Obstruction in Violation of 18 U.S.C. §248(a)(1): an award of compensatory and punitive damages or, alternatively, statutory damages in favor of Plaintiff CompassCare and against Defendant Page and the Doe Defendants, jointly and severally, as well as costs and reasonable attorney fees.

(C) As to the Third Cause of Action - Engaging in force in violation of 18 U.S.C. §248(a): an award of compensatory and punitive damages or, alternatively, statutory damages in favor of Plaintiff CompassCare and against the Doe Defendants, jointly and severally, as well as costs and reasonable attorney fees.

(D) As to the Fourth Cause of Action - Damaging the Property of a Reproductive Health Services Facility in Violation of 18 U.S.C. §248(a)(3): an award of compensatory and punitive damages or, in the alternative, statutory damages under FACE against Defendants Page, Kamke and the Doe Defendants, jointly and severally, as well as the costs of suit and reasonable attorney fees.

(E) As to the Fifth Cause of Action - Permanent Injunctive Relief under 18 U.S.C. §248(c)(1)(B): a permanent injunction prohibiting Defendants Page, Kamke and the Doe Defendants, and all other persons, known or unknown, acting on their behalf or in concert with them, from knowingly being present within fifteen feet of either edge of any doorway, walkway, or driveway entrance of any CompassCare facility in the State of New York with the intent to injure, intimidate, or interfere with any person, or attempt to do so, because that person is or has been obtaining or providing reproductive health services as provided by CompassCare, or with the intent to damage the property of a CompassCare facility, or attempt to do so, because such facility provides reproductive health services.

(F) Such other relief as this Court deems just and appropriate.

**JURY DEMAND**

Plaintiff demands trial by jury of all issues so triable.

Dated: January 8, 2024

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*d/b/a/ CompassCare*



# **EXHIBIT A**

[metrovoicenews.com](https://metrovoicenews.com)

## 23 and counting: pro-life organizations firebombed, damaged ahead of court ruling

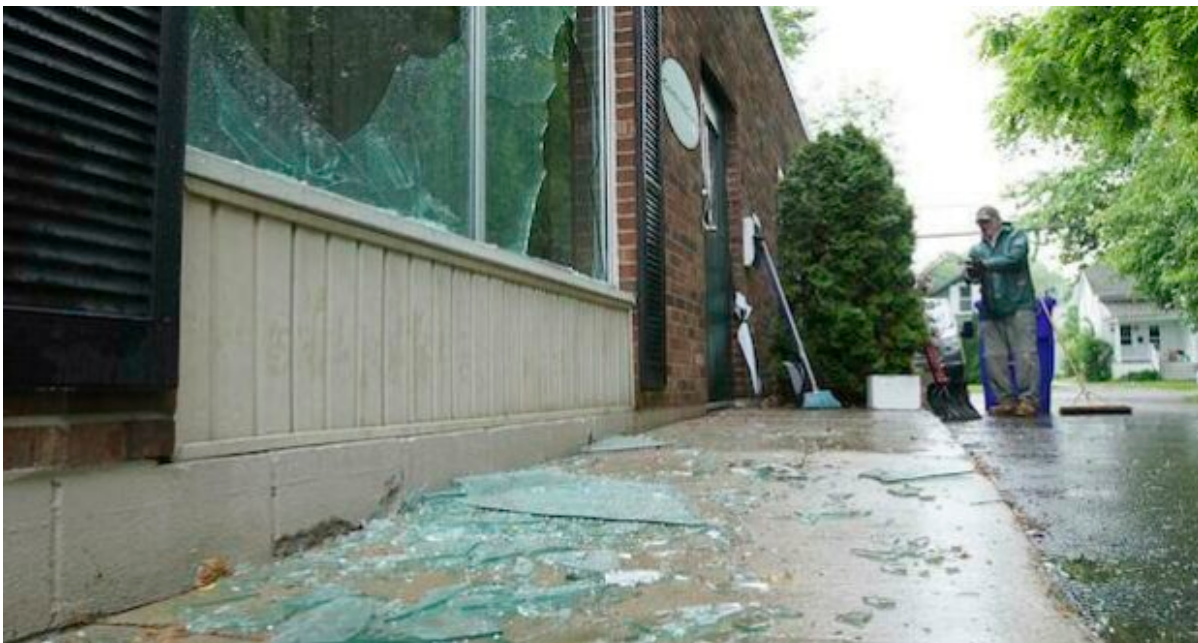
*Dwight Widaman*

4-5 minutes

[Home](#) / [News](#) / [Media Watch](#) / 23 and counting: pro-life organizations firebombed, damaged ahead of court ruling



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Glass is cleaned up outside CompassCare in Amherst, NY. It was firebombed June 7.

June 15, 2022

A rash of nationwide firebombings and [vandalism](#) of pro-life organizations in recent weeks has gone virtually unreported by the national media. The groups firebombed or otherwise attacked include pro-life educational non-profits and clinics that serve at-risk women and girls in crisis pregnancies.

Here's a list provided by Catholic Vote:

1. Hollywood, FL — South Broward Pregnancy Center and Archdiocese of Miami Respect Life Ministry
2. Asheville, NC — Mountain Area Pregnancy Services
3. Manassas, VA — First Care Women's Health
4. Alexandria, VA — Concerned Women for America
5. Reiserstown, MD — Alpha Pregnancy Center
6. Frederick, MD — BirthRight of Frederick
7. Frederick, MD — CareNet Frederick
8. Reiserstown, MD — Alpha Pregnancy Center
9. Buffalo, NY — CompassCare Pregnancy Services
10. Madison, WI — Wisconsin Family Action
11. Des Moines, IA — Agape Pregnancy Resource Center
12. Denton, TX — Woman to Woman Pregnancy Resource Center
13. Austin, TX — Trotter House
14. Long Beach, CA — His Nesting Place Home for Mothers & Children
15. Sebastopol, CA — Pregnancy Center Billboard

16. Eugene, OR — Dove Medical Clinic
17. Keizer, OR — Oregon Right to Life
18. Gresham, OR — Gresham Pregnancy Resource Center
19. Portland, OR — Southeast Portland Pregnancy Resource Center
20. Vancouver, WA — Options360 Women's Clinic
21. Federal Way, WA — Care Net Pregnancy and Family Services of Puget Sound
22. Lynnwood, WA — Next Step Pregnancy Services

The attacks have ramped up in recent weeks as the Supreme Court nears its decision that could return the regulation of abortion back to the states. In essence, the nation's high court could overturn *Roe v. Wade*. If that occurred, abortion would no longer be a protected "right" by the federal government but would still be legal in many states.

The Biden administration has not condemned any of the bombings and took days to condemn the assassination attempt of Supreme Court Justice Brett Kavanaugh. The attempt against Kavanaugh was narrowly averted and only after the attacker phoned into 911 his intent to kill the justice.

The assassination attempt received 0 seconds of coverage on Sunday morning news programs (with the exception of Fox News Sunday) immediately after the attack.

On Monday, the Republican National Convention [took aim](#).

On Thursday, Arizona Senate candidate Blake Masters witnessed a man with a Black Lives Matter t-shirt allegedly attacking a pro-life woman by hitting her in the jaw. On May 4, a Catholic parish in

Denver, Colorado, was vandalized “with smashed windows and spray-painted pro-abortion messages,” the *Washington Times* reported

Democrat leaders have been criticized by some in their own party and even left-leaning media outlets like CNN for inciting the violence. But it is primarily conservatives that are calling out the violence.

Kansas Senator Roger Marshal again criticized Sen. Chuck Schumer (D-NY) who seemingly incited violence in a speech to followers during a nomination protest rally.

“Chuck Schumer called for this violence. The armed lunatic who showed up at Justice Brett Kavanaugh’s home was simply following orders. Justice cannot be served under the threat of mob violence,” Marshall, a Republican, tweeted.

The messaging in the attacks has many worried. “If abortions aren’t safe then you aren’t either,” vandals wrote on a Wisconsin Family Action facility.

In Oregon, Gresham Pregnancy Resource Center was reportedly firebombed on Saturday. Images [show](#) a burned-out shell inside the center’s facility, according to Life News.

The attack followed firebombings of pro-life groups and pregnancy centers in Wisconsin, [Oregon](#), and [New York](#).

The court could hand down its ruling on the Mississippi case any day. Barricades have been put up around the Supreme Court in Washington to guard against planned protests.

Tagged with: [abortion](#) [assassination attempt](#) [court ruling](#) [courts](#) [culture](#) [firebombs](#) [fireboming](#) [kavanaugh](#) [news reporting](#) [politics](#)

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The advertisement features a collection of modern kitchen appliances including a refrigerator, an oven, a microwave, a dishwasher, a washing machine, and a dryer. The background is a light blue and white pattern.



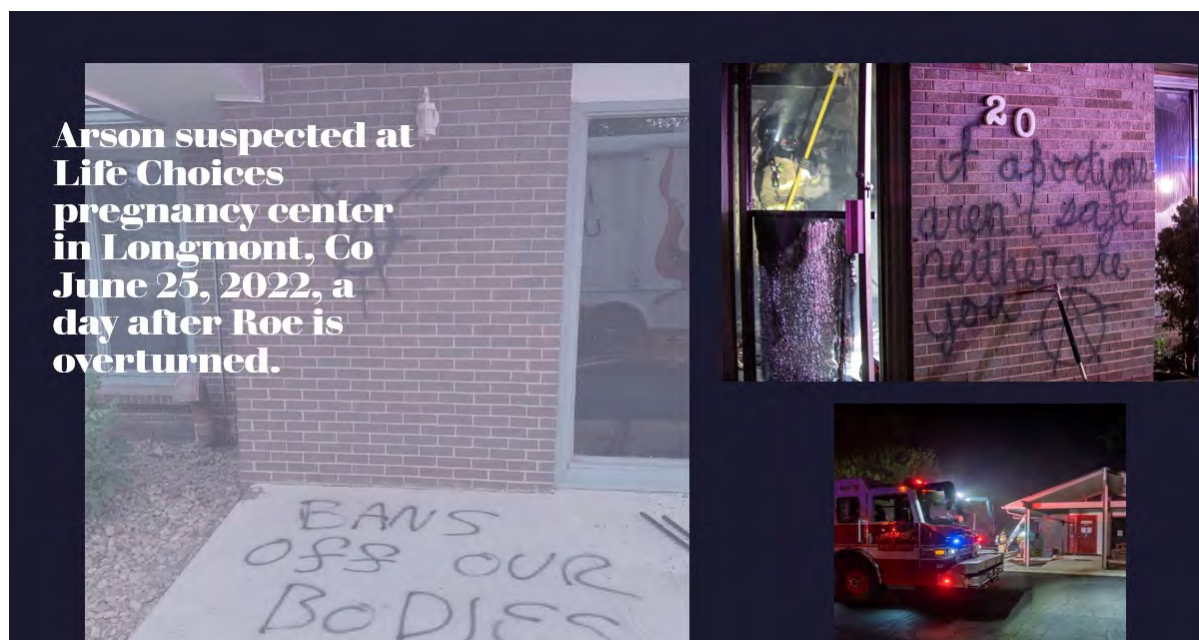
[liveaction.org](https://www.liveaction.org)

## More pregnancy centers and churches hit with arson and vandalism in subsequent 'Night of Rage' attacks


14-18 minutes

Pro-abortion arsonists attacked another pro-life pregnancy center and acts of vandalism continued in subsequent 'Night of Rage' attacks following the *Dobbs* Supreme Court ruling overturning *Roe v. Wade* and *Planned Parenthood v. Casey*.

The group Jane's Revenge, which has issued [new messages](#) in past days, previously [vowed](#) a 'Night of Rage' following the Court decision which led to limited [violence](#) in the streets and an arson attack at the Life Choices pregnancy Center in Longmont, Colorado.







Life Choices Pregnancy Center in Colorado arson June 25 2022  
with spray painted threat (Images: Longmont Fire Department)

[Jane's Revenge](#) is named after the "[Jane Collective](#)," a 1960s underground group out of Chicago, Illinois, which provided or referred for illegal abortions. It is not clear whether this is one group, multiple groups, or individuals using the same insignia. "Jane's Revenge" tends to speak through intermediaries — so far, mostly [anarchist](#) groups — to promote their messages.

The group previously [claimed responsibility](#) for the arson and violence at some pro-life centers across the country where in May, the Wisconsin Family Action offices were [Jane's Revenge's](#) first [target](#) of an [arson attack](#), with the group taking credit for firebombing the facility. Last month, a Molotov cocktail was thrown into the offices of [Oregon Right to Life](#), and on June 6, perpetrators spray painted the message "Jane was here" when they firebombed [CompassCare Pregnancy Services](#) in Buffalo, New York. On June 11, a pregnancy center in the area of Gresham, Oregon, was also [firebombed](#) but no messages were left behind.

### **Arson at Colorado PRC**

The most recent arson attack took place on June 25 in Colorado, although to date no one has claimed responsibility yet. According to the Longmont Fire Department, fire engines were dispatched in the early morning hours (3:17 am) to the Life Choices pregnancy Center in Longmont. The Department's [Facebook page](#) contained images of the fire damaged building, and included a brief message: "The building sustained fire and heavy smoke damage. At the arrival of police and fire staff, the front of the property had been

vandalized with black paint. This fire is being investigated as arson.”

Images uploaded by the Department show spray painted messages that read “bans off our bodies” and also include the [Jane’s Revenge threat](#), “If abortions aren’t safe neither are you.” The criminals also painted the facility with the Anarchist ‘A’ symbol.



Life Choices Pregnancy Center arson June 25 2022 with Jane’s Revenge type threat graffiti (Image: Longmont Fire Department)

### **Virginia Church arson investigated, pro-abortion graffiti spray-painted**

On June 26, the St. John Neumann Catholic Community Church in Fairfax County, Virginia, was the subject of a [possible arson](#) according to [WJLA.com](#). “The church was damaged by graffiti related to the recent Supreme Court Roe v Wade ruling,” a [tweet](#) by a local reporter also stated.

&lt;span data-mce-type="bookmark" style="display: inline-block; width: 0px; overflow: hidden; line-height: 0;" class="mce\_SELRES\_start"&gt;&lt;/span&gt;

A news release [published](#) by the Fairfax County Police Department claimed that “Fire and Rescue responded at 6:45 Sunday morning to a call for smoldering mulch at the St. John Neumann Catholic Community Church, 11900 Lawyers Road, Reston. Fire and Rescue personnel detected an accelerant was likely used in the fire and observed graffiti spray painted on a sign at the entrance of the church. Fire and Rescue personnel requested police to the scene to assist with the investigation. Officers found three additional locations on the back of the building damaged by graffiti. The remarks spray painted were related to the recent Supreme Court Roe v Wade ruling. Officers are working with the staff of the Church to review surveillance footage...”

Anyone who may have information about this [incident](#) is asked to contact detectives at 703-478-0904.

A Fox5DC reporter [tweeted images](#) of the messages. Some were vulgar, and one claimed, “This won’t stop.”



Lindsay Watts  
@LindsayAWatts

NOW: @FairfaxCountyPD investigating vandalism at a Reston Catholic church tied to overturn of Roe v Wade. Police say this is also an arson investigation bc small fire set here at St John Neumann Church 1/3 @fox5dc



5:29 PM · Jun 26, 2022 · Twitter for iPhone



Lindsay Watts  
@LindsayAWatts · 6h

3/3 Police say they are reviewing surveillance camera footage after vandalism at the Catholic church was discovered early this morning. Initial call was for smoking mulch. @FairfaxCountyPD say accelerant used.



6

12

17





Graffiti abortion messages at St John Neuman Catholic Church on Reston VA. (Images: Twitter)

## Virginia PRC vandalized

The Blue Ridge Pregnancy Center (BRPC) in Lynchburg, Virginia, was also vandalized on June 25 with spray painted Jane's Revenge signatures. The pro-life center published images of the crime to their [Instagram](#) and [Facebook](#) pages (seen below), which showed that the vandals had broken windows and left a graffiti message typical of Jane's Revenge. It read, "If Abortion Aint Safe You Aint Safe!" and was signed Jane's Revenge with an anarchist 'A' symbol. The pro-life organization's sign was also tagged with the anarchist 'A.'

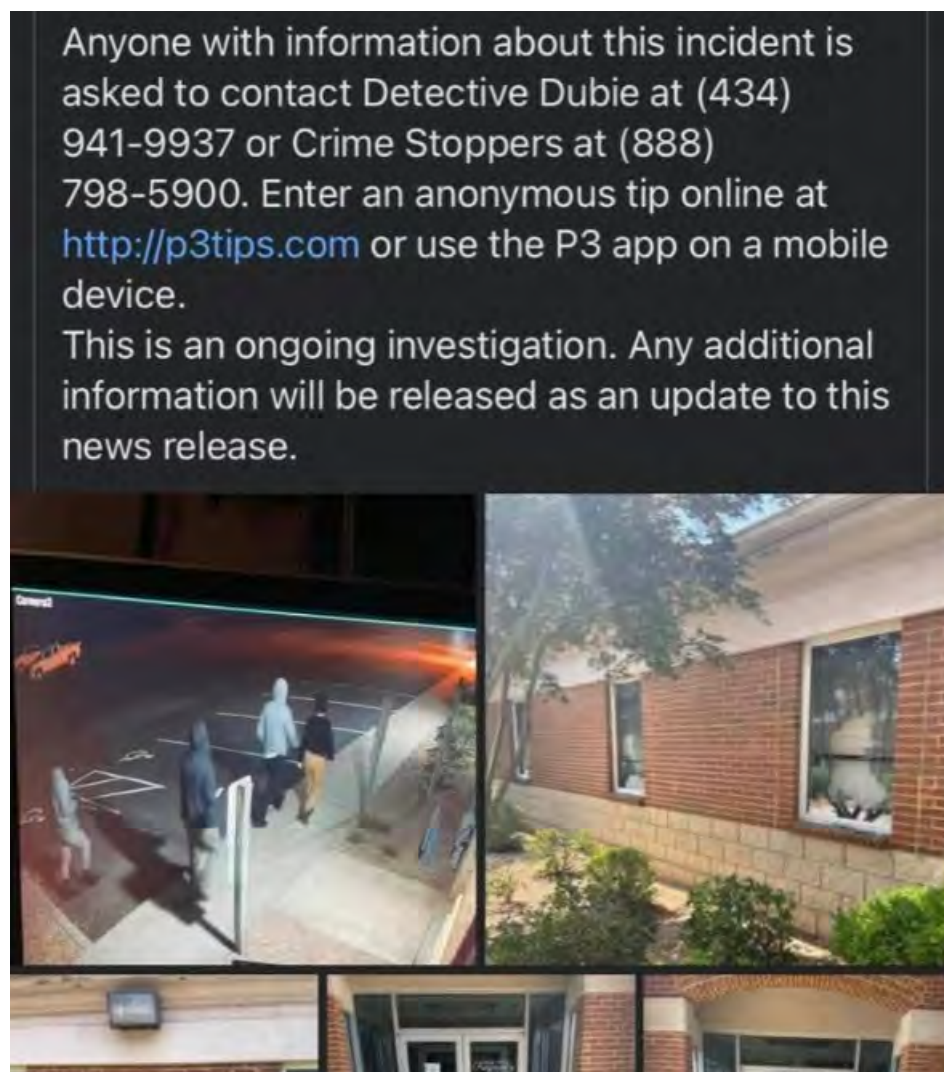
On Facebook, BRPC wrote, "PLEASE PRAY! Urgent call for help, BRPC has been vandalized greatly and we need the support of our community now more than ever. If you are available to give financial support for additional security, and lots of prayers, we would greatly appreciate you. We know God has His hand over our center and the work at BRPC is not finished."



## Blue Ridge Pregnancy Center vandalized with Janes Revenge threat

WBJ7.com [reported](#), "According to Lynchburg Police Department, officers responded at around 10:40 a.m. Saturday to 3701 Old Forest Road for a report of property damage and found the building spray-painted with graffiti. Multiple windows were also broken. Video footage from security cameras shows the masked group of people carrying out the acts. Contact 434-941-9937 with information."

The police are asking for information leading to an arrest and anyone with information about the arson is encouraged to contact Detective Dubie or Crime Stoppers are the image below.





A post [published](#) to the Abolition Media blog, allegedly sent by the group Jane's Revenge, took credit for the incident.

### Informed Choices Medical Clinic PRC in Iowa City vandalized

A message on Twitter claimed that a “fake clinic” in Iowa City, Iowa, was vandalized on June 25. The [post](#) included images of the Informed Choices Medical Clinic, allegedly from that same evening, as well as one from the following day. Live Action News has not confirmed with the pregnancy center, but the Iowa City [police activity page](#) shows a call was dispatched to the address of the pregnancy center the morning of June 26 for “Criminal Mischief/Vandalism” where officers found “graffiti and paint on the sign.”



Oliver  
@Ollie\_XVX

Fake clinic “Informed Choices” in Iowa City got a redecoration tonight



10:44 PM · Jun 25, 2022 · Twitter for iPhone



Oliver  
@Ollie\_XVX · 3h  
Replying to @Ollie\_XVX  
Update this morning



2 47

Informed Choices pregnancy resource center vandalized June 25  
Iowa City (Image: Twitter)



## California pro-life center attacked

Tree of Life in Paso Robles, California, was also vandalized over the weekend. Police [told](#) KSBY.com that they believe the vandalism may have happened in light of the Supreme Court's decision to overturn Roe v. Wade sometimes between Friday night and Saturday morning. According to Paso Robles police, Tree of Life received a letter from Jane's Revenge. Police also told the media outlet that the group's letter stated that they intended to cause harm and damage to the Tree of Life pregnancy support center. The center allegedly received a warning of the attack from the Jane's Revenge, which [later published a communique and image](#) of a center they vandalized in the state.

&lt;span data-mce-type="bookmark" style="display: inline-block; width: 0px; overflow: hidden; line-height: 0;" class="mce\_SELRES\_start"&gt;&lt;/span&gt;

## Portland rioters property and damage pregnancy center operated by 'pro-choice Democrat'

Portland police have [reported](#) that on June 25 around 10 p.m., "a group of over 60 people marched out of Grant Park, Northeast 33rd Avenue and U.S. Grant Place. Participants, most dressed in all black, began breaking windows and scrawling graffiti." Footage of the graffiti has been [published](#) at Fox News and include the "Jane's Revenge" tag as well as suggestions to "riot" and "kill the Supreme Court." A separate spray-painted message published by journalist Andy Ngo [read](#) "Death to SCOTUS."







## Proabortion graffiti spray painted around Portland after SCOTUS overturned Roe Janes Revenge

The [police release](#) confirmed that “several banks and coffee shops had broken windows. A van belonging to Portland Public Schools was damaged, broken windows and tagged with paint.” In addition, the report states that, “A pregnancy resource center was vandalized.” A reporter for the Oregonian tweeted a short video of the damage to the Mother and Child Center. Ironically, the center’s executive director, Maura White, [told the Oregonian](#) that it is *not an anti-abortion* pregnancy center. “We’re not anything like that,” White told the paper. “I’m a pro-choice, liberal Catholic Democrat.”

Maura White went on [Fox News](#) June 27 to describe what the center does and the extent of the damage. She said the vandals smashed out windows and graffitied over everything causing at least \$10K in damage, she told Fox News. She claimed the center has been attacked on social media as well. “Antifa, other people sending out information about us. They don’t understand what we’re doing,” she stated. “We’re here helping people, we help anyone who walks in our door,” she added.

“My organization, we are non-profit... they mistakenly thought that we were out here doing anti-abortion everything. The violence was

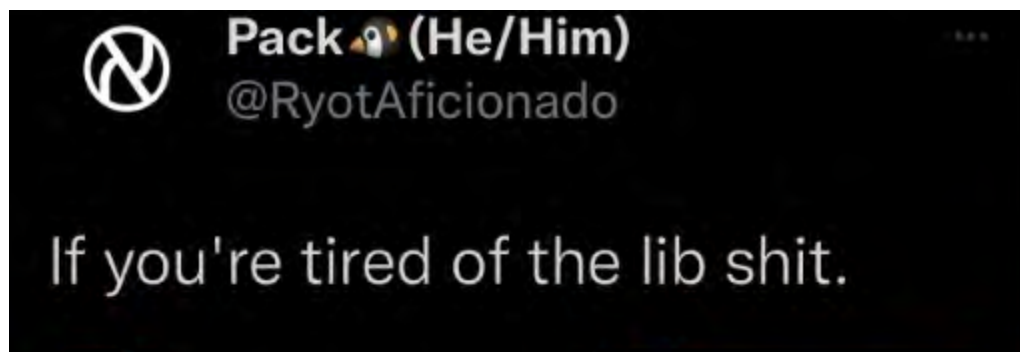
horrible,” she stated. She added that she was contacted by police and the FBI that something like this could occur and pointed to the defund the police movement which she claimed impacted law enforcement’s ability to be on the streets.

White said she did not understand how rioting by alleged pro-choice activists was in any way helpful to the abortion rights cause.



Pregnancy center operated by prochoice Dem attacked in Portland

The “direct action” event was [advertised as a response to the overturning of Roe v. Wade on Friday](#), the Oregonian [reported](#). “If abortions aren’t safe then you aren’t either,” read one flyer announcing the march, the paper noted. A copy of the flyer was [published](#) by journalist Andy Ngo on Twitter.





Direct Action Portland Flyer after SCOTUS overturned Roe If abortions aren't safe

### Ten arrested outside Eugene, Oregon PRC

In Eugene, Oregon, a protest was [planned](#) outside the [previously vandalized Dove Medical Clinic](#) pregnancy center the night the Supreme Court announced the overturn of Roe. The pro-life center had been previously [vandalized](#) and spray-painted with the "A" anarchy symbol, along with the phrases "Abortion is Healthcare" and "Not a Clinic" and signed "from Jane."



James Croxton (He/Him)  
@jwcroxton



Well, I'm back out and near the Dove Medical Center in Eugene where a "Night of Rage" is supposed to take place at 10 p.m.

Earlier today, people were seen gathered in the parking lot, on the roof, and they boarded up all the windows.



11:55 PM · Jun 24, 2022 · Twitter for Android

Night of Rage protest at Dove Medical PRC in Eugene planned  
(Image: Twitter)

A [news release](#) by the Eugene police states, "Due to the potential for property damage toward a business located in Eugene, as well as the general safety and security of the other businesses and residents downtown, Eugene Police monitored the situation."

According to the release, as more people arrived in late hours of the night, police saw "[s]ome people... picking up rocks and several

began putting on gas masks. One female had a chemical pump sprayer and she was pumping it up.”

The release states that a crowd of about 75 pro-abortion people began to “advanced closer to officers” with some throwing “smoke bombs at officers along with several filled water bottles.” The [riotous crowd](#) was warned by law enforcement that they would be arrested but reportedly did not comply with police orders. Police report that “arrests were made, with people fighting with officers and not complying with lawful orders.”

“Some officers suffered minor injuries during the event, which lasted about five hours,” police noted.

### **Protester charged with attempted murder for attempting to burn LAPD police officer**

A pro-abortion supporter was arrested and charged with attempted murder on June 24 for allegedly [attacking](#) a police officer with a “makeshift flamethrower.” A [news release](#) by the LAPD explains, “On Friday, June 24, 2022 at around 8:20 p.m., LAPD officers at 5th Street and Main [in Los Angeles] were assaulted by projectiles, fireworks and a makeshift blow torch, resulting in two arrests and four officers injured... *Resisting an Executive Officer*’ and the other for *Attempted Murder*’ on a police officer.”

KTLA added, “a small group of protesters did clash with police in downtown. Bottles, rocks and fireworks were seen thrown at officers during a later portion of the protest.” This matched the [LAPD news release](#) which also stated, “The vast majority of those involved were peaceful and law abiding, however, a much smaller group of individuals took to the streets with the intention of creating chaos and destruction.” Police identified the subject as “30-year-old

Michael Ortiz,” and KTLA reported the attack against the officer, who was hospitalized with burn injuries. A second person, identified as 23-year-old Juliana Bernado, was also arrested “after she allegedly tried to take an officer’s baton.” A short video of the incident is below:

### **Louisiana tombstones for unborn children defaced**

Tombstones for unborn children were defaced at a church in Louisiana. A shrine to the Virgin Mary at the Holy Name of Mary Catholic Church in Algiers was vandalized with red paint on Saturday June 25, according to [Nola.com](https://www.nola.com), which also reported that “Dog walkers at a park near Holy Name of Mary Roman Catholic Church discovered the vandalism to its Virgin Mary shrine, the Rev. Eugene Jacques said. Sometime overnight, someone poured a gallon of red paint across the shrine, which consists of a statue of Mary and Jesus flanked by tombstones for the unborn, and planted a sign saying, ‘In Memory of Women Who Die From Lack of Legal Abortion.’”







A shrine to the Virgin Mary at Holy Name of Mary Roman Catholic Church in Algiers Point was found splashed with red paint on Saturday, June 26, 2022, a day after the U.S. Supreme Court overturned its Roe v. Wade ruling establishing a constitutional right to abortion. Parishioners soon cleaned up the shrine, which also includes tombstones for the unborn.

Shrine to Virgin Mary at Holy Name of Mary Roman Catholic Church in Algiers vandalized (Image posted to Nola.com)

### **New York church vandalized days prior to SCOTUS opinion**

On June 22, St. Margaret's Roman Catholic Church on Hertel Avenue in Buffalo, New York, was vandalized. According to [WKBW](#), "Police said sometime between 10 p.m. Wednesday and 9 a.m. Thursday several religious statues and garden pots in the back of the church gardens were damaged."



St Margarets Roman Catholic Church Buffalo NY vandalized

Also in New York, graffiti with several pro-abortion messages including, "Abort the Court" and "Jane was Here" were seen lining the path after during a pro-abortion march.



A state by state list of recent pro-abortion attacks can be read at Live Action News [here](#).

[“Like” Live Action News on Facebook](#) **for more pro-life news and commentary!**

LIVE ACTION

[foxnews.com](https://www.foxnews.com)

# Miami pro-life clinic vandalized: 'If abortions aren't safe, neither are you'

*Emmett Jones*

2-3 minutes

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NEWYou can now listen to Fox News articles!

A [pro-life pregnancy clinic](#) in Miami was vandalized on Sunday, almost two weeks after the Supreme Court's decision to overturn Roe v. Wade. Surveillance footage caught two women walking to the back of clinic, where they spray-painted the walls with their intended message.

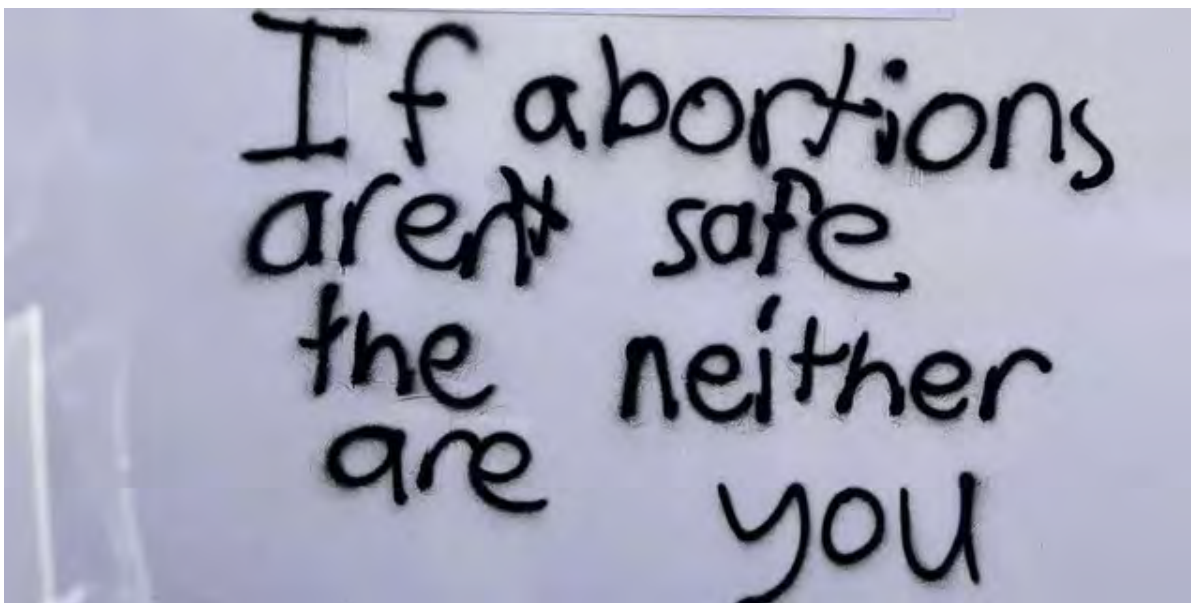
One of the vandals wrote: 'If abortions aren't safe, the [sic] neither are you.'

Martha Avila, the president of Pregnancy Help Clinic in Miami-Dade County's Hialeah neighborhood, shared the vandalism footage with WSVN, in which one of the suspects shined a laser over the camera.

"I don't think the people that participated in this were confused at all," Avila [told WSVN](#). "They targeted a place that gives counseling to women that their DNA is pro-life, and they try to counsel women to help bring babies to term."

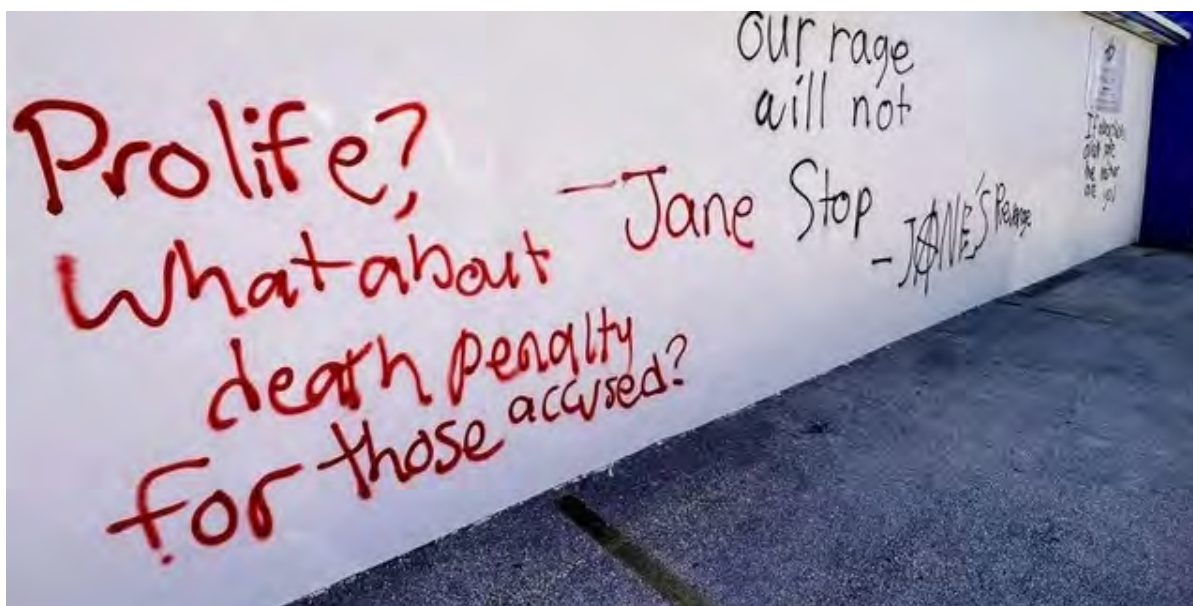
[FIVE OF THE MOST INCEDIARY ATTACKS ON SUPREME COURT FOLLOWING ROE, GUN, EPA RULINGS: 'WE HAVE TO](#)

## RAISE HELL'



A Miami clinic was vandalized days before a state judge blocked Florida's 15-week abortion ban (Mayor Esteban Bovo, Hialeah, Florida)

Hialeah Mayor Steve Bovo told FOX News Digital that those who are "radical in nature" disregard [the systems of democracy](#). As a result, they resort to vandalism.



A Miami clinic was vandalized days before a state judge blocked Florida's 15-week abortion ban (Mayor Esteban Bovo, Hialeah,

Florida)

"There are traditional ways to petition your government. Instead, people are usurping those ways of the law by destroying property out of anger," said Mayor Bovo.

He took to Instagram, as well, following the vandalism.

"The @hialeahpd is investigating what I consider a [hate crime carried out](#) by a radical individual or group of individuals." said Bovo in his caption.



A pro-life clinic in Miami was vandalized days before the state blocked Florida's 15 week abortion ban (Mayor Esteban Bovo, Hialeah, Florida)

[CLICK HERE TO GET THE FOX NEWS APP](#)

The vandalism comes days before a Florida [judge blocked a state law](#) that banned abortions after 15 weeks.



# Explore

⚙ Settings

← Tweet

**The New York Times**   
@nytimes

The headquarters of an anti-abortion group in Madison, Wisconsin, was set on fire Sunday in an act of vandalism that included the attempted use of a Molotov cocktail and graffiti that read "If abortions aren't safe then you aren't either," the police said.



nytimes.com

**Anti-Abortion Group in Wisconsin Is Hit by Arson, Authorities Say**

A Molotov cocktail was used against Wisconsin Family Action in Madison and did not ignite, but another fire was set, the police said.

7:30 AM · May 9, 2022 · SocialFlow

355 Retweets 151 Quote Tweets 1,429 Likes

This Tweet is from a suspended account. [Learn more](#)**omphaloskepsis** @fammi\_ridere · May 9

Replying to @JasonShaneBiden and @nytimes

Do you say the same thing whenever there is an attack to an abortion clinic? Do you take them as a sign that the right is violent? Or these things only work in one way?

1

**Julio the guard donkey** 🇺🇸🇺🇦 @DonkeyJulio · May 9

Replying to @nytimes

Nice false flag opportunity, huh? 🤔

20



113

**dragool** @dragool6 · May 9

Replying to @nytimes

This is a good way to undermine your own cause.

8



81

**Kait** 🇺🇸🇩🇪 @qirenni · May 9

Replying to @dragool6 and @nytimes

Which is why it almost certainly was anti-choicers who did it.

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**Kait**  @qirenni · May 9


Replying to @nytimes


It was probably a false flag.

But. But. You know.

 24




 26



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**optimaltrain** @optimaltrain1 · May 9


Replying to @nytimes

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## Vandals hit Vermont Statehouse: 'If abortions aren't safe you're not either'



Police report the Vermont Statehouse was vandalized early Saturday morning with broken windows and a message. (Montpelier Police Dept.)

By WCAX Staff and [Jordan Gartner](#)

Published: Jun. 25, 2022 at 3:47 PM EDT



MONTPELIER, Vt. (WCAX/Gray News) - Police in Montpelier say a state building was vandalized Saturday when windows were broken and a message was painted outside the main door.

The Capitol Police reports the incident happened at the Vermont Statehouse at around 2 a.m. The vandals left the building with seven broken windows and a message: "If abortions aren't safe you're not either."

The vandalism came in the aftermath of the U.S. Supreme Court decision that reversed *Roe v. Wade*, the 1973 court decision that provided a constitutional right to abortion.

[WCAX](#) reports damages were estimated to be more than \$25,000. The Statehouse was expected to open Saturday for its summer tour, but that has been postponed until Monday.





Authorities urged anyone with further information on the incident to contact the Capitol Police at 802-828-2273.

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## Fire at Colorado pregnancy center being investigated as arson in wake of Roe v. Wade reversal



Other graffiti on the building read, "Bans off our bodies." (Longmont Public Safety)

By [Lindsey Grewe](#)

Published: Jun. 27, 2022 at 8:51 AM EDT



LONGMONT, Colo. (KKTV) - A fire at a Colorado pregnancy center is being investigated as possible arson in the wake of the controversial Supreme Court ruling overturning Roe v. Wade.

Tensions have remained high across the nation as generations who have never known a country without abortion rights grapple with the reversal of a nearly 50-year-old decision. Protests have broken out across the U.S., and law enforcement in Longmont say the fire and vandalism at Life Choices may very well have been the handiwork of someone angered over the ruling.

The Longmont Public Safety Department says they were called to the crisis pregnancy center just after 3 a.m. Saturday.

"The building sustained fire and heavy smoke damage. At the arrival of police and fire staff, the front of the property had been vandalized with black paint," the department said.



Graffiti on one of the walls offered a threat, "If abortions aren't safe, neither are you."

Officials are asking businesses and/or anyone living between Collyer and Lashley and 15th Avenue and 11th Avenue to check their surveillance videos for any activity between 2:45 a.m. and 3:30 a.m. Anyone with information that can help identify the suspect(s) responsible are encouraged to call 303-774-3700 and reference case number 22-5219.

"From either side, I hate to see vandalism like this," neighbor Cynthia Campbell told 11 News sister station CBS Denver. "This organization has been open several decades now, and I don't think they have a huge budget. ... I'm just sorry that they've been vandalized like this."

The FBI is assisting with the investigation.

The nullification of Roe v. Wade effectively outlaws abortion across half the U.S., but in Colorado, access to the procedure remains unchanged. The state [passed a bill earlier this year](#) ensuring abortion stayed legal at all stages of pregnancy regardless of the [Dobbs decision](#), and Gov. Jared Polis signed it into law in April.

With abortion banned in all but two of Colorado's neighbors -- New Mexico and Kansas being the lone exceptions for now, [with a vote looming in Kansas that could end access there](#) -- the state has been bracing for an influx of out-of-state patients seeking the procedure.



The states in red are likely or certain to ban abortion now that the protected right to the procedure has been overturned. (KKTv)

Life Choices is a non-profit that has been in Longmont since 1984. It says its mission is to offer free services related to pregnancy and sexual health, and encourage people to seek other options besides abortion.

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## Has your state experienced recent pro-abortion violence? Find out here.

29-37 minutes



In recent weeks, Live Action News has documented multiple acts of pro-abortion violence and hate crimes perpetrated against pro-life centers and churches in several states, due to the leaked draft Supreme Court opinion penned by Justice Samuel Alito, which appeared to show the Court's plan to overturn *Roe v. Wade*.

Here are the currently known incidents of pro-abortion violence, below:

- **Alabama:** A sign outside the Women's Hope Medical Clinic was [damaged](#). (5/19/2022)
- **Alaska:** The [Community Pregnancy Center](#) in Anchorage, Alaska, was allegedly "[vandalized](#)...with graffiti, a broken front door and nails," according to [AlaskaWatchman.com](#). (6/2/2022)
- **Arizona:** [LifeBoat Coffee](#), which [offers customers](#) life-affirming pro-life labels for their brand and is public about supporting the pro-life cause, was [vandalized](#) with a rock thrown through the business's window. Owner John Lillis told Live Action News that the Phoenix coffee establishment has also been targeted with hate mail. "Lifeboat Coffee Loves Life – we help women (and men), the unborn, the elderly and the infirmed," owner John Lillis told Live Action News (7/6/2022).
- **California:** A [tweet](#) published [@GraffitiRadical](#) revealed the image of a vandalized pro-life pregnancy center billboard allegedly out of Sebastopol, California (5/24/2022). In addition, [His Nesting Place](#), a pro-life maternity home in Long Beach, California, which holds regular church services for the women they serve, had their Sunday services [interrupted](#) by an angry pro-abortion woman (5/16/2022). Disruptions also [took place](#) at Cathedral of Our Lady of the Angels in Los Angeles (5/8/2022) while someone attempted to [disrupt](#) priestly ordinations at the Cathedral of St. Mary of the Assumption in San Francisco (6/4/2022). A [Woman's Friend Pregnancy Resource Clinic](#) in Yuba City was [vandalized](#) with three rocks used to break a large window. (6/27/2022-6/28/2022; see news [video](#)). The mobile clinic of Options Health, a pregnancy

center in Concord, California, was [vandalized](#), National Catholic Register [reported](#) (6/25/2022).

- **Colorado:** St. John XXIII parish in Fort Collins was [vandalized](#) (5/8/2022) with the graffiti messages, “My Body My Choice” and the anarchist ‘A’ (see [news video](#)) while vandals [sprayed graffiti](#) on doors and statutes of the Sacred Heart of Mary Parish (5/3/2022) in [Boulder](#) (see [news video](#)). The Longmont Fire Department in Colorado is asking for help to identify the pro-abortion arsonists that set fire to the Life Choices pregnancy Center in Longmont (6/25/22). According to the Department’s [Facebook page](#), engines were dispatched at 3:17 am to the pregnancy center on Mountain View Avenue. “The building sustained fire and heavy smoke damage. At the arrival of police and fire staff, the front of the property had been vandalized with black paint. This fire is being investigated as arson,” the post states. Images uploaded by the Department show spray painted messages that read “bans off our bodies” and also include the Jane’s Revenge threat, “If abortions aren’t safe neither are you.” The criminals also painted the facility with the Anarchist ‘A’ symbol.
- **Washington, D.C.:** Police [arrested](#) Nicholas John Roske, who allegedly traveled to Maryland with the specific goal of killing Supreme Court Justice Brett Kavanaugh, based on the Supreme Court [leaked draft opinion](#) overturning *Roe v. Wade* (6/8/2022). Capitol Hill Crisis Pregnancy Center was [vandalized](#) (6/3/2022) and the words “Jane says revenge” were spray painted on the building (see [news video](#)). That same day, DC Antifascists Action [published images on Twitter](#) of a threatening message found on an overpass in D.C., signed “Jane’s Revenge.” It also read, “If abortions aren’t safe, then you’re not either, Jane’s Revenge.” A

statue in D.C. was [vandalized](#) and posted to Twitter with the message, “My body my choice” (5/5/2022). Vandals also [damaged](#) the headquarters of [Concerned Women for America \(CWA\)](#), and CWA staff has [reported](#) that they have had coffee cups hurled at them in their parking garage, and the offenders have been consistently confrontational and made vulgar gestures at them (5/7/2022).

- **Florida:** The Respect Life Office in Hollywood, Florida, was [vandalized and tagged](#) “Janes Revenge” along with the threat, “If abortions aren’t safe then neither are you” (5/28/2022). The pro-abortion TEQUESTA BLACK STAR Blog [published](#) additional images. (See [video](#).) The Heartbeat of Miami center in Hialeah, Florida, was [vandalized](#) with hate messages according to [Local10.com](#). A spokesperson said the center was first contacted by phone with threats around the time the Supreme Court draft opinion was leaked suggesting the eventual overturning of *Roe v. Wade*. The two suspects “spray painted over security cameras before painting an apparent threat and the calling card ‘Jane’s Revenge’ with an anarchist’s logo,” the news outlet wrote, adding that the FBI and Homeland Security are involved in the investigation. Messages included “If abortions aren’t safe the [ sic] neither are you,” “our rage will not stop,” “Jane’s Revenge,” and a message about the death penalty (7/5/2022).

LifeChoice Pregnancy Center in Winter Haven, Florida, was [vandalized](#) — and according to [photos](#), a spray painted on the center’s building read, “Your time is up,” “We’re coming for U” and “Jane’s revenge.” The signature Jane’s Revenge threat, “If abortions aren’t safe then you aren’t either,” was also left. The symbol “A” anarchy symbol can be seen in the images spray



painted on the center's sign and near the front door. A security camera was covered with pink paint, The Ledger reported (6/25-26/2022). The entrance sign of Saint Phillips AME Church at 6200 Centerville Road in Tallahassee was [vandalized](#) with the pro-abortion message, "My BODY" spray painted in red, according to the [Tallahassee Democrat](#). In addition to the graffiti at the church, an unknown person spray-painted "Death to conservatives my body your choice," along with an anarchy symbol in the roadway (6/26/2022).

- **Indiana:** A War Memorial in Monroe County, Indiana, was [targeted](#) with pro-abortion graffiti, which read, "Free the uterus" and "Abort the court," Fox59.com [reported](#). The message "Her body her choice" was left on the side of the courthouse, "while other pro-abortion rights messages were scrawled onto a war memorial in front of the courthouse," including the message "Abortion is not murder," the media outlet wrote (6/25/2022).
- **Iowa:** An communique allegedly from Jane's Revenge claim the domestic terrorist pro-abortion group [vandalized](#) a pregnancy center in Iowa (6/2/2022). According to [KCCI](#), vandals painted graffiti messages and broke windows at the Agape Pregnancy Resource Center in Des Moines. A [twitter post](#) found online included images showing the Informed Choices Medical Clinic vandalized (6/25/2022). Iowa City [police activity page](#) shows a call was dispatched to the address of the pregnancy center the morning of June 26 for "Criminal Mischief/Vandalism" where officers found "graffiti and paint on the sign."
- **Kansas:** Surveillance cameras caught a vandal committing "[criminal damage](#)" at the [Church of the Ascension](#) in Overland, where the perpetrator defaced a sign promoting a pro-life state

proposition (**5/11/2022**). A “pro-life sign at St. Teresa of Avila Catholic Church in Hutchinson, Kansas, about 50 miles northwest of Wichita was [vandalized](#),” National Catholic Register [reported](#) (**7/4/2022**). Church of the Ascension in Overland Park has been [vandalized](#) since May with the most recent incident reported by [KSHB](#): “In red, the words ‘My Body My Choice’ were painted across the walls of Ascension Catholic School, which is connected to the church, along with a statue of the Blessed Virgin Mary” (**7/10/2022**).

- **Kentucky:** [St. Louis Catholic Church in Louisville](#) was [vandalized](#) with pro-abortion messages (**5/8/2022**).
- **Louisiana:** Tombstones for unborn children were defaced with red paint at the shrine to the Virgin Mary at Holy Name of Mary Catholic Church in Algiers (**6/25/2022**), according to [Nola.com](#). The paper reported, “someone poured a gallon of red paint across the shrine, which consists of a statue of Mary and Jesus flanked by tombstones for the unborn, and planted a sign saying, ‘In Memory of Women Who Die From Lack of Legal Abortion.’” The Woman’s New Life Clinic Pregnancy Resource Center in Baton Rouge was [vandalized](#) with the vandals spray painting red paint on the building, signs, and parking lot, including the infamous “Jane’s Revenge” insignia. Other spray-painted messages included “Abortion is a Right,” “Fake Clinic,” “Abortion is Healthcare,” the anti-police acronym “ACAB,” and “Not Safe” (**7/11/2022**).
- **Maryland:** Birthright in Frederick was [vandalized](#) and tagged “Defend Roe” and also, “F\*\*\* Fake Clinic” (**5/15/2022**). In [addition](#), [vandals attacked](#) Alpha Pregnancy Center in Reisterstown (see [news video](#)) and [tagged](#) the facility with the threatening messages, “If abortions aren’t safe, neither are you”

and “Jane’s Revenge” (5/13/2022). [CareNet Pregnancy Center of Frederick](#) was also [vandalized](#) (5/4/2022). Montgomery County Fire and Rescue responded to a [fire](#) at the Bethesda United Methodist Church, which according to media reports do not hold a position on abortion (7/9/2022). Montgomery County Fire and Rescue responded to a [fire](#) at the St. Jane Frances de Chantal Catholic Church and Rev. Samuel Giese [said](#) he felt the arson may have been tied to the church’s pro-life beliefs although nothing left at the church indicated a motive (7/10/2022). Wildwood Baptist Church in Bethesda was [vandalized](#) and pastor Rev. David Sayne told the Washington Times that St. Jane parishioners have frequently joined his congregation in praying at the local abortion business owned by LeRoy Carhart ([news video](#)) (7/10/2022).

- **Massachusetts:** Blue and yellow paint was [splashed](#) on Problem Pregnancy on Pleasant Street in Worcester and the signature ‘Jane’s Revenge’ was left behind, CBS Boston [reported](#). Images of the assault were published at [Abolition Media blog](#) and the [Jane’s Revenge blog](#) (7/7/2022). Clearway Clinic PRC was [vandalized](#), and a statement they [published](#) to their blog claims vandals “smashed glass for two doors and three windows. The entrance was also spray-painted with the words ‘Jane’s Revenge.’” Images of the assault were published at [Abolition Media blog](#) and the [Jane’s Revenge blog](#) (7/7/2022).
- **Michigan:** Family Life Services pregnancy center in Ypsilanti was [vandalized](#) (5/11-12/2022) with pro-abortion messages. St. Joseph’s Priory in Armada, Michigan, was [defaced](#) with graffiti messages reading “666” (5/2/2022). A nearly naked Riseup4AbortionRights activist [disrupted](#) Mass (6/12/2022) at the St. Veronica Parish in Eastpointe, Michigan, shouting: “Overturn

Roe? Hell no,” “Abortion on Demand Without Apology,” and “Overturn Roe.” The congregants responded with “Abortion kills babies.” A [video](#) of the disruption was uploaded by Refuse Fascism Ohio. The Lennon Pregnancy Center in Dearborn Heights spray painted (6/19/2022) with the threat, “If abortions isn’t safe, neither are you!” and multiple windows were also broken out. A message by abortion extremists allegedly emailed to the anarchist blog [Abolition Media](#), has [claimed credit for the attack](#) and notes that two pro-life pregnancy centers in the Detroit, Michigan area had been targeted. The post, “[Fake Clinic Attacked in Detroit](#)” relayed a message emailed to the blog by the perpetrators which read, “On the night of 6/19 a gang of criminal queers smashed the windows of two fake abortion clinics in the greater Detroit area leaving the messages ‘if abortion isn’t safe, neither are you’ and ‘fake clinic.’ Jane will have her revenge.” In addition, Jackson Right to Life’s office and Congressman Tim Walberg’s office were also targeted (6/22/2022) in Michigan by pro-abortion zealots who appear to be following orders from domestic terrorist group Jane’s Revenge. Both offices [share a building](#) where vandals smashed the windows and the glass in the front door. In addition, they tagged the Jackson RTL sign with “Jane’s Revenge” and in an apparent error also tagged a home two doors down from the pro-life building with a threatening message that read, “If abortion isn’t safe niether [sic] RU!” The Pregnancy Care Center in Redford, Michigan, was [vandalized](#) (6/19/2022) with windows broken. It was also spray painted with the message “This is a Fake Clinic,” and was signed, “Jane.”

- **Minnesota:** The Minnesota Citizens Concerned for Life (MCCL) office was vandalized for the second time in recent weeks. Images

in a tweet [published](#) by MCCL show windows busted along with the spray painted message “Abortion is Liberation.”

(6/14/2022) Birthright in St. Paul was [targeted](#); according to [MPRNews.org](#), “Black spray paint on the side of the building read ‘Blood On Your Hands.’ The front of the building had red spray paint with three messages: ‘Abort America,’ ‘F\*\*\* You’ and ‘Janes Revenge,’” the media outlet wrote. The crime was confirmed on the center’s [Facebook page](#). (7/4/2022)

- **Mississippi:** Mt. Avery Missionary Baptist Church in Columbus was [vandalized](#) with spray painted messages reading, “Keep your laws off my body” and “Girls just want to have fundamental human rights” (5/23/2022).
- **New Hampshire:** Police in Littleton, New Hampshire, are [investigating](#) whether a message — “fund abortion/abort God,” found scrawled on the exterior of a Christian, pro-life pregnancy center — is a hate crime. Chief Paul Smith [told](#) the Union Leader that a person from the Pathways Pregnancy Care Center on Redington Street notified his department about the message. Smith [told](#) the NH Journal that they have already contacted the New Hampshire Attorney General’s Office about the possibility this could end up being charged as a hate crime. Michael Garrity, director of communications at the New Hampshire Department of Justice, said the state Attorney General’s Office is watching for Littleton’s results (6/28/2022).
- **New York:** CompassCare Pregnancy Services in Buffalo was [firebombed](#) and tagged with the message “Jane was here” (watch [news video](#)). Because over 600 pro-life pregnancy centers nationwide are using their materials CompassCare feels they will be further targeted, and sent an e-mail which read in part, “Sources



monitoring the social media pages of abortion activists flagged multiple comments encouraging followers to locate the home of CompassCare CEO Jim Harden. Harden's wife and young children relocated yesterday, as police track suspicious activity at their home" (6/7/2022). In addition to those incidents, a [vulgar pro-abortion protest](#) was held at Saint Patrick's Cathedral which also [received](#) threats to bomb and burn down the church (5/7/2022). A tabernacle was stolen, the Holy Eucharist was thrown on the floor, and statues of angels on the altar were [decapitated and destroyed](#) (5/29/2022) at the St. Augustine Catholic Church in Brooklyn. Statues of Lúcia dos Santos and Jacinta Marto, two of the children who witnessed the apparitions of Our Lady of Fatima, were [smashed and decapitated](#) (5/17/2022) at Our Lady of Sorrows Catholic Church in NYC. St. Margaret's Roman Catholic Church on Hertel Avenue in Buffalo, New York, was vandalized (6/22/2022). According to [WKBW](#), "Police said sometime between 10 p.m. Wednesday and 9 a.m. Thursday several religious statues and garden pots in the back of the church gardens were damaged." A Catholic Church near Amsterdam Avenue was [graffitied](#) with the Jane's Revenge style threat which [read](#), "If abortion isn't safe, neither are you," law enforcement told the [NY Post](#). "The chilling message, spray-painted in black, was discovered around 5:30 a.m. [June 27, 2022] on one outer door of Ascension Roman Catholic Church near Amsterdam Avenue, coupled with the name of the group, 'Jane's Revenge,' on another door, along with an anarchy symbol," police also said, according to the report (6/27/2022).

- **North Carolina:** Mountain Area Pregnancy Services in Asheville was [vandalized](#) with the threatening message, "If abortions aren't safe, neither are you!" (6/6/2022) along with an anarchist symbol on

the front of the building (see this [news video](#) and this [video](#)). Holy Family Catholic Church in Hillsborough, North Carolina, was vandalized with what the Carolina Journal [described](#) as “anti-Christian and pro-abortion messages in bright yellow spray paint.” According to the report, the spray painted messages, which included an anarchist symbol, read “F\*CK THE CHURCH” and “I love abortion” (7/3/2022). The GOP headquarters was [spray painted](#) with the Jane’s Revenge threat, “If abortion isn’t safe neither r you,” according to multiple social media [posts](#) on [Twitter](#) (6/24/2022).

- **Ohio:** Right to Life of Northeast Ohio in Akron was [vandalized](#) according to Executive Director Allie Frazier, who published images of the damage in a [Twitter post](#). The vandals broke several windows and left threatening spray-painted messages which originated with the Jane’s Revenge earlier threats that read, “If abortion isn’t safe, neither RU” and signed “Jane” along with other expletives (7/7/2022). Right to Life of Northeast Ohio in Akron was earlier [targeted](#) by pro-abortion activists (6/24/2022). According to the organization’s [Facebook page](#), “On 6/24, the @NEOhioLife office was targeted by pro-abortion activists who gathered outside and placed pro-abortion signs. They also rang our Ring, gave us the middle finger, and hung a coat hanger on our door.”
- **Oregon:** In Gresham, First Image pro-life pregnancy center, located in the greater Portland area (6/11/2022), was [set on fire](#) ([news video](#)). A Molotov cocktail was thrown into the offices of [Oregon Right to Life](#) (5/8/2022). Twitter handle [@rubyfire77](#) [posted](#) images (5/27/2022) of pro-abortion graffiti messages spray painted on the [Dove Medical Clinic](#) in

Eugene, Oregon, [vandalized](#) and spray painted with the “A” anarchy symbol, along with the phrases “Abortion is Healthcare” and “Not a Clinic” and signed “from Jane.” The Southeast Portland Pregnancy Resource Center in [Portland](#) was vandalized with the message “F\*\*\* CPCs” (5/2/2022). An image of a [vandalized](#) pro-life billboard with the message “Abort the Supreme Court” was posted (5/20/2022). Portland abortion supporters vandalized property with messages to “kill the Supreme Court” and “riot” while they damage pregnancy center operated by a woman identifying as a “pro-choice Democrat” (6/25/2022). According to the [Oregonian](#), Mother and Child Center is “not an anti-abortion pregnancy center” and is operated by a “pro-choice, liberal Catholic Democrat.” The “direct action” event was [advertised as a response to the overturning of Roe v. Wade on Friday](#), the [Oregonian reported](#). “If abortions aren’t safe then you aren’t either,” read one flyer [published](#) by journalist Andy Ngo on Twitter. Footage of the graffiti has been [published](#) at Fox News and include the “Jane’s Revenge” tag as well as suggestions to “riot” and “kill the Supreme Court.” A separate spray-painted message published by journalist Andy Ngo [read](#) “Death to SCOTUS.” In Eugene, a protest [planned](#) outside the [previously vandalized Dove Medical Clinic](#) pregnancy center, the night the Supreme Court announced the overturn of Roe ended with arrests after a crowd of about 75 pro-abortion people began to “advanced closer to officers” with some throwing “smoke bombs at officers along with several filled water bottles” (6/24/22). A release [published](#) by police described that the [riotous crowd](#) was warned by law enforcement that they would be arrested but did not comply with police orders, the police statement claimed. Police report that “arrests were made, with people fighting with officers and not complying with lawful orders.”

Adding that, “Some officers suffered minor injuries during the event, which lasted about five hours.” CatholicPhilly.com [reported](#) that police officers successfully [drove dozens of anarchist rioters](#) away from [Holy Redeemer Church in Portland](#). A [tweet](#) published by @hunnybadgermom responded, “I do believe they had every intention of wrecking the historic Holy Redeemer Catholic Church, like they did with the Hinson Church building a few days before. They’ve made it plain they hate Christians” (7/1/2022).

Michael Lawrence, lead pastor of [Hinson Baptist Church](#) in Portland, Oregon, [penned](#) a detailed account about [vandalism](#) received by multiple ministries, which surround the [First Image Pregnancy Resource Center](#). Pastor Lawrence noted that despite a police presence and previous warning of a “direct action” attack, in broad daylight, the “fully masked” vandals circled the block, and within just minutes then, “Using umbrellas and masks to shield their identities from security cameras, they smashed almost every ground-floor window on the side of the building that hadn’t yet been boarded up and covered the building in vile graffiti aimed specifically at Christians.” (6/27/2022). In [Portland](#), the Catholic Sentinel [reported](#) that “[a] sign at All Saints Parish in the well-off Laurelhurst district [was] spray-painted with the ominous message that abortion rights extremists have been using: ‘If abortions aren’t safe, neither are you.’ The letters were blood red.” In addition, the paper reports that “The Mother and Child Education Center was vandalized again... This time, attackers painted graffiti and smashed windows, causing an estimated \$10,000 damage.” (6/26/2022)

- **Pennsylvania:** The image of a [vandalized](#) pro-life billboard in Pittsburgh from Pro-life Across America was published

(5/17/2022). An e-mail sent to [Abolitionist Media](#) allegedly by a group called “Anti Hope Brigade” claimed responsibility for smashing the windows of a Philadelphia Pregnancy Center (6/11/2022). The email read: “We smashed out all of the windows of the ‘Hope’ pregnancy center on Broad st. We are tired of your ‘family values’ and you forcing families, and your values onto our bodies. This fake clinic spread lies and is part of a broader attempt to strip away body autonomy from hundreds of women and people. We are inspired by the actions of comrades in Wisconsin, Colorado, New York, and a growing list of places. If the attack on abortion does not stop, our attacks will broaden. This is also intended as a small gesture of complicity with all those imprisoned by the state, in honor of June 11th.” National Catholic Register [reported](#) that St. Patrick Catholic Church in Philadelphia was [vandalized](#) (6/25/2022).

- **Tennessee:** A Molotov cocktail was [thrown](#) through the first floor window of Hope Clinic for Women, a pregnancy resource center in midtown Nashville. Thankfully it did not ignite, the Metro Nashville Police Department (MNPD) [said](#). The FBI is assisting the MNPD Specialized Investigations Division and Hazardous Devices Unit in the investigation and has [released](#) photos of the suspect (6/30/2022).
- **Texas:** Two Pregnancy Resource Centers in [Denton, Texas](#), were spray painted with abortion messaging (5/7/2022) like, “Not a Clinic” and “Forced birth is Murder” (see this [news video](#) and [this one](#)). The [Trotter House](#) PRC in [Austin, Texas](#), was vandalized (5/3/2022). In addition, abortion supporters with RiseUp4AbortionRights [disrupted](#) the [Lakewood Church](#) where Joel Osteen preaches in Houston (6/5/2022). Activists also [spray-](#)



[painted](#) “Pro-choice is pro-life” (5/8/2022) on the front and side doors of Holy Rosary Catholic Church in Houston (see [news video](#)). That same day, [FoxNews](#) reported that [two Catholic churches in Katy](#) were also vandalized and at St. Bartholomew the Apostle Catholic Church, the vandals attempted to remove the tabernacle containing the sacred presence of Christ and the Eucharist. At St. Elizabeth Ann Seton Catholic Church, someone attempted to desecrate the Eucharist (5/8/2022 – see [news video](#)).

- **Utah:** National Catholic Register [reported](#) that the Pregnancy Resource Center of Salt Lake City [received](#) a threatening sign taped to their front door which read, “If abortions aren’t safe neither are you,” and on the backside, “Women are fragile, not like a flower, but more like a bomb” (6/24/2022). Arches New Hope Pregnancy Center in Moab, Utah, was [vandalized](#) and spray painted messages were left on the building (7/6/2022).
- **Vermont:** The State House was [vandalized](#) with a [spray painted message](#) that read, “If abortions arent safe you arent either,” according to a News nation report. Live Action News [previously reported](#) that a Jane’s Revenge “e-mail” claimed to have vandalized a PRC in Burlington but the group offered no evidence (6/25/2022).
- **Virginia:** The [First Care Women’s Health](#) pregnancy resource center in [Manassas](#) was [vandalized](#) with messages that read, “Fake Clinic,” “Liars,” and “Abortion is a Right” (5/8/2022). Blue Ridge Pregnancy Center in Lynchburg, Virginia, was vandalized on (6/25/2022). The center posted images to their [Instagram page](#) and [Facebook page](#) showing the spray painted threat typical of Jane’s Revenge, which read, “If Abortion Aint Safe You Aint Safe!” In a separate part of the building, the graffiti was signed Jane’s Revenge with an anarchist ‘A’ symbol. The pro-life organization’s

sign was also tagged with the anarchist 'A.' The center wrote on Facebook, "PLEASE PRAY! Urgent call for help, BRPC has been vandalized greatly and we need the support of our community now more than ever. If you are available to give financial support for additional security, and lots of prayers, we would greatly appreciate you. We know God has His hand over our center and the work at BRPC is not finished."

The St. John Neumann Catholic Community Church in Fairfax County was the subject of a possible arson according to [WJLA.com](#). "The church was damaged by graffiti related to the recent Supreme Court Roe v Wade ruling," a [tweet](#) by a local reporter also stated. A news release [published](#) by the Fairfax County Police Department claimed that Fire and Rescue responded at 6:45am on **6/26/2022** and discovered smoldering mulch at the St. John Neumann Catholic Community Church. Fire and Rescue personnel also detected an accelerant was likely used in the fire and observed graffiti spray painted on a sign at the entrance of the church. They requested police to the scene to assist with the investigation. "Officers found three additional locations on the back of the building damaged by graffiti. The remarks spray painted were related to the recent Supreme Court Roe v Wade ruling. Officers are working with the staff of the Church to review surveillance footage," the report stated. A Fox5DC reporter [tweeted images](#) of the messages, one of which claimed, "This won't stop."

- **Washington:** Someone plastered posters on the [Care Net Puget Sound](#) offices in Federal Way, claiming the facility wants to "push forced birth options" (**6/4/2022**). In addition, Next Step Pregnancy Center in Lynnwood was [vandalized](#) with the threat, "If abortion isn't safe, you aren't either" (**5/25/2022**). And an alleged "cell" of the

Jane's Revenge terrorist group claimed responsibility for the [vandalism](#) of four churches in Olympia; their message was signed "Jane's Revenge Bo Brown Memorial Cell" (5/22/2022). Pro-abortion activists lay on the steps of St. James Cathedral [in Seattle](#) with fake blood (5/8/2022). Options360 Women's Clinic in Vancouver, Washington, was [vandalized](#) and spray painted with the now infamous "Jane's Revenge" insignia (6/8/2022). Arsonists [firebombed](#) the office of pro-life lawmaker, House Rep. Andrew Barkis' in Olympia, Washington. Lieutenant Paul Lower of the Olympia Police Department [told](#) Fox News Digital that the department is investigating the incident as arson and said the police "always want to pay attention" to any potentially politically motivated crime. To date, no one has taken credit for the crime and no motive has been made public. "Somebody throwing a lit flare through my window to bring my building down is not an angry tenant because we withheld their deposit to clean their carpet," Barkis told Fox News. "That's not what's behind this. We'll find out in the investigation" (6/14/2022). Care Net of Puget Sound's center in Kenmore, Washington, was [vandalized](#) and a burned American flag was left on scene. The center's [Facebook page](#) stated, "This morning our Kenmore center was vandalized, and an American flag was burned and left on our property. We are saddened that any group or person would choose to use vandalism, intimidation and threats of violence to make a point. We choose to believe that people who commit such crimes do not understand what we do and do not understand that in hurting us, they ultimately hurt the vulnerable women and families we are serving. We are more resolved than ever to continue the work we have been doing for the past 40 years –providing free, compassionate, confidential, non-judgmental care to every woman

who walks through our doors.” The Jane’s Revenge message “if abortions aren’t safe you aren’t either!” was spray painted on the building (7/5/2022).

St. Anthony’s Catholic Church in Renton was [vandalized](#), according to [q13Fox.com](#): “Authorities say the suspect spray-painted messages saying ‘Abortions save lives’ and ‘F!!! you’ all over the building. In addition, almost all the outside locks were jammed with a hardening substance, and four stained-glass windows were shattered. The suspect also broke into the church, stealing money from four donation boxes,” the media report states (6/24/2022). An attempted [arson attack](#) hit the Two Hearts Pregnancy Aid center in Everett and a message published to the [PRC’s website](#) confirmed an incident: “Our building sustained some vandalism... The authorities were called and the cause of the damage is under investigation. Two Hearts Pregnancy Aid is a non-political, non-sectarian social-service organization. We remain committed to providing material goods and support to expectant parents, babies, and children up to 5 years old,” it stated (6/27/2022). In [Bellevue](#), a man was [caught on video smashing glass windows and spray-painting messages all over St. Louise Catholic Church](#). Messages left at the church ranged from “liar,” to “religion of hate” and “go to your fake Hell,” [Fox13 News](#) reported (6/27/2022).

- **Wisconsin:** Wisconsin Family Action was the first [victim](#) of an [arson attack](#) (5/8/2022). See [video here](#), [here](#), [here](#), and [here](#). St. Bernard Catholic Church in Madison, Wisconsin, was [vandalized](#) with a [profane message](#) that read. “Pro life my f\*\*\*ing a\*\* let’s talk about all the native kids you’ve killed!!!” (7/1/2022).

Read additional acts or threats of violence can be

read [here](#), [here](#), [here](#) and [here](#).

The pro-life legal firm Thomas More Society previously issued a [letter](#) warning some of the more public pro-abortion groups that if they threaten places of worship, there could be “significant legal liability” under the F.A.C.E. federal law. In addition, 16 United States Senators sent a [letter](#) to U.S. Attorney General Merrick Garland asking for the DOJ to respond to the increasing incidents of pro-abortion violence.

*Editor’s Note: Some dates have been corrected. This post will continue to be updated as needed. One PA incident has been removed due to error.*

**[“Like” Live Action News on Facebook](#) for more pro-life news and commentary!**

LIVE ACTION



# **EXHIBIT B**

# Jane's Revenge

The Time Is Now – Stand Up – Take Action

## Two fake clinics attacked – Worcester, MA

Posted on [2022/07/08](#)



Two fake clinics in Worcester, Massachusetts (Problem Pregnancy and Clearway Clinic) have been attacked. The assholes who lie to vulnerable pregnant people about abortion to confuse them and convince them to not seek abortions discovered this morning that their buildings had been redecorated with paint and broken glass. As others have said, it is fun and easy to attack. As more people discover the joy in attacking the infrastructure of the patriarchy, the attacks will surely continue with increasing frequency. To anyone reading this thinking that it sounds like a

good time, consider this your invitation to join the party. To any purveyors of patriarchy that might be reading this, fuck off, or you could be next.

Joyfully yours,  
Jane







Posted in [General](#)

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## Another Fake Clinic Attacked – “Mother and Unborn Baby Care” – Southfield, MI

Posted on [2022/07/03](#)

On the morning of 6/29/22, the many fragile windows of “Mother and Unborn Baby Care” in Southfield Michigan were smashed. The work was signed “Jane’s Revenge” and “If abortions aren’t safe, neither are you”.

*Editor Note: According to news reports (<https://www.liveaction.org/news/pro-life-offices-michigan-vandalized-activists/>), this is the fourth similar attack in the area in the last couple weeks.*

Posted in [General](#)

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## Fake Pregnancy Center Smashed – Lynchburg, VA

Posted on [2022/06/30](#)

Blue Ridge Pregnancy Center HQ – Lynchburg, VA – 6.24.22

On June 24th, the night after the Supreme Court overturned Roe v. Wade, Jane’s Revenge smashed the windows of the Blue Ridge Pregnancy Center’s headquarters in so-called Lynchburg Virginia. Lynchburg is a hotbed of Christian fascism, home to the Neo-Nazi Wolves of Vinland group and Jerry Falwell’s “Liberty” university. We smashed out their windows, and vandalized their building with slogans and imagery ranging from coat hangers to “vote blue lol.” The ground in front of their now smashed front door reads “if abortion ain’t safe you ain’t safe.” We encourage anyone to gather their friends, pick up a crowbar or a bottle of spray paint, find your nearest misogyny shop, courthouse, or pig pen and go fucking ape shit. We have learned that this is really quite simple, all you need is a few trusted friends and a little bit of passion!



Fascism is on the rise but so are we! May the sound of shattering glass (seriously it is so satisfying :)) dry your tears.

-Jane's Revenge #187







Posted in [General](#)

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## Jane's Revenge: Attack on Anti-Abortion Center – Everett, WA

Posted on [2022/06/29](#)

On the night of June 27 a local Jane's Revenge cell visited our neighborhood PRC (patriarchal rapist collaborators/pregnancy resource center) in Everett WA and had a smashing time with their window glass and a flaming cocktail.

We echo what you have heard from JR before – in acting, we learn to act, and in waiting, we learn only to wait. Acting is fun and easy. You only need a few very trusted comrades. Those who would kill us are vulnerable and visible. We've only just begun.

In revolutionary joy, Jane's Revenge

Posted in [General](#)

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## Anti-Abortion Pregnancy Center Torched – Longmont, CO



Posted on [2022/06/27](#)

An anti-abortion “crisis pregnancy center” in Longmont, CO was set on fire and tagged with a circle-A and the message “if abortions aren’t safe neither are you” on Saturday.

The building sustained fire and heavy smoke damage.

Another message spray painted on the front entryway to the Life Choices says: “BANS OFF OUR BODIES.”

Militants are escalating their attacks on anti-abortion clinics since Friday’s Supreme Court decision to overturn the landmark federal law that allows abortions, Roe vs. Wade.

Posted in [General](#)

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## Communique from Jane’s Revenge – Burlington, VT

Posted on [2022/06/27](#)



Following the Supremacist Court's laughable attempt at control over millions of bodies with the arbitrary and retroactive overturning of its own decision on *Roe v. Wade*, in addition to further threats against the queer community made by a certain Supreme Pig, a few of us up here in so-called "Burlington, Vermont" (colonized Abenaki land) decided it was a good time to remind the tyrants that we are everywhere and that we will not be fucked with.

It came to our attention months ago that there's an anti-abortion clinic here in town masquerading as a safe place for pregnant folks to receive care and resources. Their tactic is to lure in vulnerable people with emotionally manipulative messaging about "non-judgmental support" before pulling the ol' bait and switch and doing everything they can to guilt people into carrying their unplanned pregnancies to term. The impact of concrete chunks on those old colonial window frames was absolutely titillating... We struck once, disappearing into the dark before re-emerging from another direction and striking again. A veritable volley of crashing and shattering sounds filled the neighborhood and our gay hearts to their brims.

The tired, self-congratulatory, hippie liberalism in this city is a large part of what allows organizations like this to remain in our community and to do harm to vulnerable people.

We say: fuck that. No more.

A couple of months back, our sister Fern was stabbed to death by some



transphobic asshat. Then, just weeks later, they tried to intimidate us further by smashing up our Pride Center. Still, the burnout Phish Heads did nothing. Circle jerk vigils where cis-het white hippies sound-off on their megaphones in the park like it's 1969 are obviously doing nothing with actual consequence. Spare us the performance. It's time to put up a real fight. Gather your friends and collect heavy rocks. Learn the skill of accelerant bartending. Decentralize your actions— go into the night and be feral with joy! This is the fight of our lives and it's just getting started. This time it was concrete slabs. Next time we'll bring it Wisconsin-style.

Peaceful protest is dead and so is Jerry Garcia!

Jane's Revenge lives!

Posted in [General](#)

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## Jane's Revenge – Night of Rage Communique

Posted on [2022/06/26](#)



The night of June 24 was the Night of Rage. We decided to attack a crisis pregnancy center in Glendale, California with spray paint. The phrases written

were “Jane was here”, “abort the court” , and “If abortions aren’t safe neither are you”. All across the country people protested and revolted against this attack on bodily autonomy.

As we predicted almost a month ago, the United States Supreme Court stripped millions of people of bodily autonomy and access to abortion. This is only the beginning of the attacks on autonomy in store from the courts and fascists. Up next on the chopping block is access to contraception, the legality of everyday queer life, and gay marriage. But this is part of a broader pattern of fascism within the United States.

To all the conservatives, Fox News anchors, judges, cops, Christian extremists, or federal agents reading this:

This attack is nothing in comparison to what is in store for you. Some spray paint will be the least of your worries. For decades you have bombed abortion clinics and murdered doctors. We fight not just for abortion rights, but for trans liberation, ecological harmony, decolonization, the destruction of white supremacy and capitalism, and the uprooting of the entire global civilization.

We will hunt you down and make your lives a living hell. You started this war but we will win it. So far its just been pregnancy crisis centers, but tomorrow it might be your cars, your homes, or even your lives. We support a diversity of tactics and we will not step down in this fight.

Expect us, Jane's Revenge

Posted in [General](#)

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## The Time Is Now – Stand Up – Take Action

Posted on [2022/06/25](#)



And for the allies of ours who doubt the authenticity of the communiqués and actions: there is a way you can get irrefutable proof that these actions are real. Go do one of your own. You are already one of us. Everyone with the urge to paint, to burn, to cut, to jam: now is the time. Go forth and manifest the things you wish to see. Stay safe, and practice your cursive.

—Jane's Revenge



Posted in [General](#)

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## Fake Clinic Attacked – Detroit, MI

Posted on [2022/06/21](#)



On the night of 6/19 a gang of criminal queers smashed the windows of two fake abortion clinics in the greater Detroit area leaving the messages "if abortion isn't safe, neither are you" and "fake clinic."

Jane will have her revenge

Posted in [General](#)

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## Jane's Revenge: Another

# Communiqué

Posted on [2022/06/15](#)



You have seen that we are real, and that we are not merely pushing empty words. As we said: we are not one group but many. You have seen us in Madison WI, Ft. Collins CO, Reisertown MA, Olympia WA, Des Moines IA, Lynwood WA, Washington DC, Ashville NC, Buffalo NY, Hollywood FL, Vancouver WA, Frederick MA, Denton TX, Gresham OR, Eugene OR, Portland OR, among others, and we work in countless locations invisibly. You've read the communiqués from the various cells, you've seen the proliferating messages in graffiti and elsewhere, and you know that we are serious.

We were unsurprised to see thirty days come and thirty days pass with no sign of concilience or even bare-minimum self-reflection from you who impersonate healthcare providers in order to harm the vulnerable. History may not repeat itself, but it certainly rhymes, and we've already seen such stanzas where medical autonomy is stripped away, humanity is increasingly criminalized, and merely surviving becomes largely untenable.

Your thirty days expired yesterday. We offered an honourable way out. You could have walked away. Now the leash is off. And we will make it as hard as possible for your campaign of oppression to continue. We have demonstrated in the past month how easy and fun it is to attack. We are versatile, we are mercurial, and we answer to no one but ourselves. We



promised to take increasingly drastic measures against oppressive infrastructures. Rest assured that we will, and those measures may not come in the form of something so easily cleaned up as fire and graffiti. Sometimes you will see what we do, and you will know that it is us. Sometimes you will think you merely are unlucky, because you cannot see the ways which we interfere in your affairs. But your pointless attempts to control others, and make life more difficult, will not be met passively. Eventually your insurance companies, and your financial backers will realize you are a bad investment.

From here forward, any anti-choice group who closes their doors, and stops operating will no longer be a target. But until you do, it's open season, and we know where your operations are. The infrastructure of the enslavers will not survive. We will never stop, back down, slow down, or retreat. We did not want this; but it is upon us, and so we must deal with it proportionally. We exist in confluence and solidarity with all others in the struggle for complete liberation. Our recourse now is to defend ourselves and to build robust, caring communities of mutual aid, so that we may heal ourselves without the need of the medical industry or any other intermediary. Through attacking, we find joy, courage, and strip the veneer of impenetrability held by these violent institutions.

And for the allies of ours who doubt the authenticity of the communiqués and actions: there is a way you can get irrefutable proof that these actions are real. Go do one of your own. You are already one of us. Everyone with the urge to paint, to burn, to cut, to jam: now is the time. Go forth and manifest the things you wish to see. Stay safe, and practice your cursive.

—Jane's Revenge

Posted in [General](#)

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# **EXHIBIT C**



abortion services in buffalo



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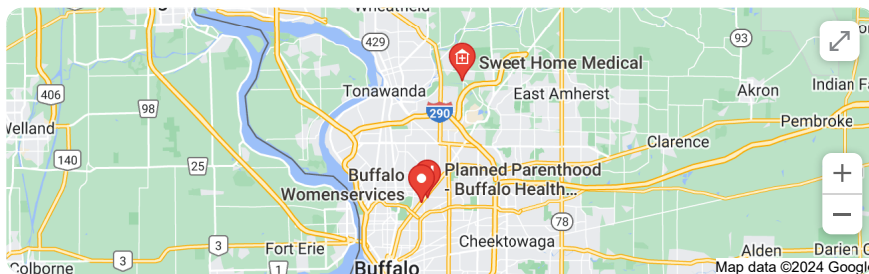
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2500 Main St · (716) 835-2510

**Closed** · Opens 9 AM Mon

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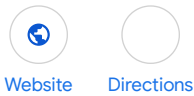
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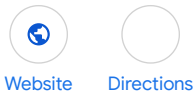



Directions

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3.1 (28) · Abortion clinic  
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Provides **abortions**




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3.9 (7) · Abortion clinic  
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**D**

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Care.com

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## Compass Care, LLC | Stamford CT

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Website



Directions

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3.7 (3) · Reproductive health clinic  
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Website



Directions

### CompassCare Pregnancy Services

3.7 (148) · Reproductive health clinic  
Rochester, NY · (585) 232-2350  
**Closed** Opens 8 AM Mon



Website



Directions

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! Abortion Pill Mifepristone Notice

# Abortion Pill Reversal

We inform, you decide.

WHAT IS ABORTION? ABORTION COSTS THE ABORTION PILL 1ST TRIMESTER SURGICAL ABORTION 2ND TRIMESTER SURGICAL ABORTION  
ABORTION RISKS AND SIDE EFFECTS ABORTION AND STDs AFTER ABORTION CARE **ABORTION PILL REVERSAL**

Abortion Pill Reversal Information

Abortion health information • An abortion is a procedure to end a pregnancy. It uses...

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## Can the Abortion Pill Process Be Reversed?

**Yes, it is possible to reverse a medical abortion.**

If administered within 72 hours of taking the first pill (Mifepristone), pregnancy-sustaining progesterone therapy can help your body reverse the effects of a medical abortion.

Medical abortions are carried out using a regimen of two different drugs<sup>[1]</sup> — mifepristone and misoprostol. The first pill, mifepristone, acts as progesterone blocker, intercepting your body's natural progesterone. Since progesterone is a necessary hormone for sustaining pregnancy, introducing a progesterone blocker makes the uterus inhospitable to pregnancy and the baby stops developing. The second pill in the regimen, misoprostol, is taken 24-48 hours after taking mifepristone. This drug causes the uterus to contract and the cervix to soften and dilate, pushing the baby out.

If progesterone therapy is administered within 72 hours of taking mifepristone and before taking misoprostol, it is possible to reverse the effects of the abortion.<sup>[2]</sup>

Progesterone therapy floods the uterus with progesterone. By increasing the amount of progesterone present after taking mifepristone (the progesterone blocker), the baby can still receive pregnancy-sustaining progesterone and has a greater chance of continuing to develop.

**If you have taken mifepristone in the last 72 hours, have NOT taken misoprostol and want to continue with a healthy pregnancy, it may be possible to reverse the effects of a medical abortion. Call CompassCare immediately.** We will perform an ultrasound to confirm that your baby is alive. If your baby is viable, your medical abortion reversal will involve natural progesterone treatments for about two and a half weeks.

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Abortion Risks and Side Effects

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## Abortion Risks and Side Effects

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Before you have any elective procedure it's important to know the potential impacts it could have on your body and future health. Here we've compiled the latest research on the impacts of abortion.

Risks and side effects vary by the type of procedure and how far along you are. If you're pregnant, CompassCare can help you determine exactly what kind of abortion procedure you could be eligible for, and discuss the specific risks and side effects associated with that procedure.

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## Common Side Effects

Most women experience some of the following after an abortion:

- Bleeding – on average, bleeding lasts 14 days but can last as long as 21 days.<sup>1,2</sup>
- Cramping
- Dizziness
- Drowsiness
- Nausea/Vomiting

These symptoms typically resolve within a week, sometimes longer.

## Possible Complications

- Damage to the womb or cervix
- Excessive bleeding
- Incomplete abortion, requiring an additional surgical abortion procedure
- Infection of the uterus or fallopian tubes
- Scarring of the inside of the uterus
- Sepsis or Septic shock
- Uterine perforation
- Death

## Future Health Risks

### Future Pre-term Deliveries

- Abortion causes a weakening of the cervix, which increases a woman's risk of future pre-term deliveries. Two recently-published studies indicate that one induced abortion increases the risk of a subsequent preterm birth by between 25% and 27%. After two or more abortions a woman's risk of preterm birth increases by between 51% and 62%.<sup>3,4</sup>
- A 2013 Canadian study found that women who have had abortions are more than twice as likely to have a very early preterm child (26 weeks gestation) compared to women who have not had an abortion. Premature births were 71% higher at 28 weeks gestation and 45% higher at 32 weeks.<sup>5</sup> (Premature births carry serious health risks for the baby. Infants who are born before 32 weeks gestational age have a much lower chance of living to adulthood.<sup>6</sup> Those that do survive have significant risk of serious disabilities, including cerebral palsy, intellectual impairment, psychological development disorders and autism.<sup>7,8,9</sup>)

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Abortion Risks and Side Effects x +

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## Future Health Risks

Future Pre-term Deliveries

Breast Cancer

- Studies show that abortion increases a woman's risk of breast cancer. A 2013 analysis revealed a 44% increased risk of breast cancer among females who had at least one induced abortion. The relative risk increased to 76% and 89% for those who had at least two or three abortions, respectively. <sup>10</sup>
- Often women considering abortion are experiencing their first pregnancy. It is important to note the protective effects of a woman's first full-term pregnancy, which causes breast cells to mature. "Among women who have given birth, an increasing number of full-term pregnancies was associated with a statistically significant decrease in the risk of breast cancer; risk was reduced by 14% for each additional birth." <sup>11</sup>

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1 0 ...





A medical abortion is a procedure in which a regimen of drugs is used to end a pregnancy. Sometimes, known as “the abortion pill,” this regimen is prescribed for abortions before 10 weeks gestation. This procedure typically costs between \$250-\$650.

The FDA approved regimen<sup>[1]</sup> involves two drugs administered on a prescribed timeline.

- First, 200 mg of a drug called mifepristone is administered orally. Mifepristone blocks progesterone, a pregnancy-sustaining hormone. Without progesterone, the uterus becomes inhospitable and the baby stops developing.
- The next drug, misoprostol, is administered orally or buccally (in the cheek) 48 hours later. Misoprostol is sometimes used to induce labor at the end of pregnancy.<sup>[2]</sup> The



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• About 7-14 days later, a healthcare provider performs pelvic exam to ensure the abortion is complete and that there are no complications.

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### Immediate Side Effects

Common side effects include vaginal bleeding that can continue for up to 4 weeks,<sup>[3]</sup> cramping, nausea, vomiting, fever, chills, diarrhea, and headache.<sup>[4]</sup>

### Risks

A medical abortion does carry some risk for complication, including prolonged bleeding and infection. There is also a risk that the abortion fails or is incomplete. In some cases, it may require a trip to the emergency department.

**Call your doctor immediately** if you bleed through more than 2 or 3 pads every hour, have foul-smelling discharge, experience severe abdominal pain that does not subside with pain medication, have a fever or flu like symptoms, faint, or have any other symptoms that persist.

### Long Term Side Effects

Medical abortions can have some [long term side effects](#), including a greater chance for future preterm births,<sup>[5]</sup> infertility,<sup>[6]</sup> breast cancer,<sup>[7]</sup> and sexual dysfunction.<sup>[8]</sup> Some patients also experience long term emotional side effects and are at a greater risk for mental health challenges.<sup>[9]</sup>

### Fetal Development

Medical abortions are prescribed between weeks 4 and 10 of pregnancy. During this time:<sup>[10]</sup>

- The baby is beginning to develop its central nervous system (including nerves, brain and spinal cord)
- The heart begins to beat
- Eyes, arms, legs, lungs, and stomach begin to form
- Hands and feet are forming

### Caution Against Off-Label Medical Abortions

Some providers prescribe medical abortion drugs outside the parameters set by the FDA, which pose increased risks to your health.

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Medical abortion pills carry some risk for complication, including prolonged bleeding and infection. There is also a risk that the abortion fails or is incomplete. In some cases, it may require a trip to the emergency department.

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## Caution Against Off-Label Medical Abortions

Some providers may prescribe medical abortion drugs outside the parameters set by the FDA, which pose increased risks to your health.

Examples of off-label use include:

- Administering medical abortion drugs after 10 weeks gestation
- Administering mifepristone and misoprostol at the same time
- Administering misoprostol alone, without first administering mifepristone

**Do not buy Mifeprex or other abortion pills over the Internet.** All medical abortions require the oversight of a licensed health care provider who can appropriately assess your health history and the gestational age of the baby. They are also required to share a copy of the Mifeprex Medication Guide, detailing the FDA-regulated drug regimen and the potential risks. Medical abortion pills purchased online are not FDA-approved and are not subject to FDA-regulated safety protections. [\[11\]](#)